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Medway Council
Regulation 18b
Consultation Response

Riverside Site, Chatham Interface
ID: 2884

CLIENT: Vistry Group

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CONTENTS

1 INTRODUCTION 3

1.1 PURPOSE OF THIS STATEMENT 3
1.2 STRUCTURE OF THE DOCUMENT 4

2 RIVERSIDE, CHATHAM INTERFACE SITE REF CCB25 5

2.1 SITE BACKGROUND 5
2.2 CASE FOR RESIDENTIAL ALLOCATION 5
2.3 OTHER CONSIDERATIONS 8
Public Rights of Way 8
Flood Risk 8
Contamination 8
Heritage Assets 8
Archaeology 9
Biodiversity Net Gain 9
Deliverability, Availability And Suitability 9
2.4 SUMMARY 10
2.5 COMMENTARY ON THE INTERIM SUSTAINABILITY APPRAISAL OF THE DRAFT LOCAL PLAN 10
2.6 SUMMARY 13

3 VISION 15

3.1 COMMENTS ON THE PROPOSED VISION 15
3.2 SUMMARY 16

4 STRATEGIC OBJECTIVES 18

4.1 COMMENTS ON THE STRATEGIC OBJECTIVES 18
4.2 SUMMARY 19

5 SPATIAL GROWTH OPTIONS 20

5.1 HOUSING SUPPLY AND DEVELOPMENT NEEDS 20
5.2 MEETING NEIGHBOURING AUTHORITIES' UNMET NEED 21
5.3 DRAFT NPPF CONSULTATION AND WRITTEN MINISTERIAL STATEMENT 22
5.4 PREFERRED SPATIAL GROWTH OPTIONS 23

6 NATURAL ENVIRONMENT 24

6.1 POLICY S1: PLANNING FOR CLIMATE CHANGE 24

Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate? 24
6.2 POLICY S2: CONSERVATION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT 25
Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view? 25
6.3 POLICY S3: NORTH KENT ESTUARY AND MARSHES DESIGNATED SITES 26
Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes. 26
6.4 POLICY DM1: FLOOD AND WATER MANAGEMENT 27
6.5 POLICY DM2: CONTAMINATED LAND 27
6.6 POLICY DM3: AIR QUALITY 27

7 BUILT ENVIRONMENT 28

7.1 POLICY T1: PROMOTING HIGH QUALITY DESIGN 28
7.2 POLICY DM5: HOUSING DESIGN 28

8 ECONOMIC DEVELOPMENT 30

8.1 POLICY S12: NEW EMPLOYMENT SITES 30

9 CONCLUSIONS 31

9.1 OVERALL SUMMARY 31
9.2 CONCLUSION 31

Appendix 1 – Pre-application advice received from Medway Council
Appendix 2 – Open Mosaic Habitat Report, Aspect Ecology

1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

1.1.1 This Statement has been prepared on behalf of Vistry Group in response to Medway Council's (MC) Regulation 18 Local Plan Consultation, 2024, for Site reference CCB25 known as 'Riverside Site, Chatham Interface'. These representations have also been submitted via the Council's consultation portal. However, this document brings together all the comments submitted on behalf of Vistry Group in response to the Local Plan. Table 1.1 provides a summary overview of all the questions/policy responses provided.

1.1.2 The representations have been prepared having regard to the tests of "Soundness" as identified in the NPPF December 2023 (para 35). For the reasons set out in our representations, the Plan as currently drafted is not considered "Sound", however where possible amendments to the policies are identified to address this.

TABLE 1.1: SUMMARY OF REPRESENTATIONS
Policy S1 – Planning for Climate Change
Policy S2 – Conservation and Enhancement of the Natural Environment
Policy S3 – North Kent Estuary and Marshes Designated Sites
Policy DM1 – Flood and Water Management
Policy DM2 – Contaminated Land
Policy DM3 – Air Quality
Policy T1 – Promoting High Quality Design
Policy DM5 - Housing Design
Policy S12 – New Employment Sites

1.1.3 The consultation document includes a draft Local plan with draft planning policies, indicative preferred locations for residential-led and non-residential development sites and housing and employment evidence bases. These representations are made within this context, making comment on parts of the plan and answering the questions proposed.

1.1.4 In making these comments it has been further demonstrated how the Chatham Interface Riverside site (ref CCB25) would provide an appropriate location as an Allocated Site in the emerging Local Plan, to provide for a residential-led development through urban regeneration, positively contributing to meeting the strategic objectives of the Local Plan. Whilst the consultation document does not expressly invite comment on individual sites, it is highly pertinent to the consideration of the different spatial strategies to consider the suitability and

deliverability of individual sites to ensure the Local Plan is deliverable and thus "Sound" (NPPF, para 35).

1.1.5 This representation submits that the site remains available, deliverable and achievable for residential-led development within the forthcoming Plan period and should not be allocated for employment. There is no evidence-led basis upon which the Site cannot be allocated as part of the forthcoming Regulation 19 Local Plan to help meet the housing needs of MC.

1.2 STRUCTURE OF THE DOCUMENT

1.2.1 Below is an overview of the structure of the remainder of the consultation response:

- **Chapter 2** – provides an overview of the Site promoted (Site CCB25, Riverside, Chatham Interface) setting out the reasons why the Site should be considered for residential-led allocation;
- **Chapters 3 & 4** – provides general commentary of the content of the plan and it's vision and objectives, in terms of both its approach to policies and evidence base.
- **Chapter 5** – provides a response to the Council's preferred SGO to meet the needs of Medway and the housing supply position;
- **Chapters 6, 7 & 8** – Provides a response to the draft Local Plan and the consultation questionnaire.
- **Chapter 9** – Sets out the overall conclusions

2 RIVERSIDE, CHATHAM INTERFACE SITE REF CCB25

2.1 SITE BACKGROUND

2.1.1 Site CCB25, known as the Riverside site, is located within the currently designated Chatham Maritime regeneration area as identified by the Local Plan 2003. The Site is supported by the current Chatham Interface Land Development Brief (June 2018), which supports the redevelopment of the Site, along with the Brunel Site (ref CCB35), for residential led opportunities whilst supporting mixed uses.

2.1.2 The Site comprises 2.56ha of land. It lies to the west of Main Gate Road, which is the main access to the Historic Dockyard, and south of Leviathan Way, overlooking the River Medway. The Site also lies within the Chatham Historic Dockyard Conservation Area. The Site is cleared of any buildings, but hardstanding and self-seeded grassed areas remain.

2.1.3 Indicative design work has shown that the Site has capacity to accommodate up to 151 units comprising a mix of apartments and some houses, with commercial units to the ground floor.

2.2 CASE FOR RESIDENTIAL ALLOCATION

2.2.1 Vistry Group has continued to promote site CCB25 for residential-led development throughout the Local Plan process and the Chatham Interface Land Development Brief supports this residential use, stating that:

"These important and prominent locations have the potential to create a new benchmark for future place-making and residential led mixed use development, providing a key part in the success of Medway as a Smart and Sustainable University Waterfront City for the 21st Century"

2.2.2 The document continues, confirming that residential development will be the dominant land use on both sites. The Site has further been subject to pre-application discussions with the Council, and the pre-application advice received in June 2023 is included at Appendix 1. This advice confirms the site is suitable in principle for residential-led development with opportunities for supporting mixed uses. No commentary is provided within this advice that the sites would be suitable for non-residential floorspace only.

2.2.3 Its allocation for non-residential development as part of the Local Plan therefore appears erroneous.

2.2.4 The plan remains absent of any real detail on employment allocations, or the amount of employment floorspace required throughout the plan period. The Interim Sustainability Appraisal notes that the Council's initial objective assessment identified a need of 274,663m^2 of employment floorspace however there is no evidence provided on how this figure has been calculated, and how the proposed employment allocations would meet this need.

2.2.5 The plan confirms at para 7.2.1 that Medway's employment land needs over the plan period will be calculated and published in forthcoming evidence. No evidence is therefore provided to support Site CCB25's allocation for non-residential development.

2.2.6 Supporting the Economic Development section of the plan is the River Medway Frontage Uses and Opportunities Report. This includes the site within area 27, Chatham Historic Dockyard. Whilst the site lies within this area geographically it has no relation to the Chatham Historic Dockyard Trust and the report further includes no commentary on the Chatham Interface Sites and how or why they should be allocated for employment purposes. The report further confirms that this has been undertaken as part of a desktop review only based on available information, and that further exploration would be needed along with detailed site investigations and appropriate engagement. It therefore cannot be relied upon in order to inform future employment allocations.

2.2.7 Policy S12 discusses new employment sites, however, simply states that sites will be allocated to meet the needs set out in the latest Employment Needs Assessment. No up-to-date Employment Needs Assessment has been prepared, with the latest from 2015, updated in 2020 to respond to the impacts from the Covid-19 Pandemic. Fundamentally there is no supporting information to justify the site's allocation for employment, it therefore is not justified and would not meet the tests of soundness as set out in para 35 of the NPPF.

2.2.8 The Council's vision as part of the Plan seeks to provide high quality development in order to strengthen the area's distinctive character, and as part of its strategic objectives it seeks to:

"secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, including bringing forward the transformation of the waterfront and town centre sites for high-quality mixed-use development, and a focus for cultural activities."

2.2.9 This is further supported by all three proposed spatial growth options which seek to maximise the use of brownfield sites, and preferred Spatial Growth Option (SG03) in particular seeks a 'brownfield first' focus with regeneration in urban centres and waterfront locations.

2.2.10 The Chatham Interface Riverside site is a key waterfront site, one of which is the Council's key focus for regeneration in order to meet the proposed vision and

objectives. It is therefore essential that it is developed as part of this next Local Plan period in order to meet these objectives.

2.2.11 The costs associated with the development are already significant, with higher construction costs the viability of the development is already stretched. Developing the site for employment purposes would therefore be unviable and result in the site continuing to remain vacant. The site has remained vacant for over twenty years, if development for employment purposes would be viable then this would already have come forward. This non-residential allocation would result in this key site stagnating, and undermine the key aims and objectives of the Local Plan as the site would undeliverable. Therefore, in order to achieve these strategic objectives making best use of brownfield land and transform the waterfront areas, the sites needs to be brought forward for residential-led development with commercial to ground floor.

2.2.12 NPPF para 123 emphasises the importance of making effective use of land and making as much use as possible of previously-developed land. However allocating this brownfield site for employment would not be making best use of the site in accordance with the NPPF.

2.2.13 As identified throughout this statement, and within more detail at section 5, the Council need to release more housing sites in order to meet their own unmet housing need and those of neighbouring authorities. The allocation of Site CCB25 for housing would therefore help to address this need.

2.2.14 The allocation in its current form would not be suitable, developable or achievable and therefore is not suitable for employment development.

2.2.15 Allocating this site for residential-led development has the potential to:

- Deliver a mixed use development in conjunction with site CCB35 within a core regeneration area where the principle of development has previously been established;
- Progress appropriate proposals for c. 151 units based on the highest quality design approaches;
- Realise the place making potential of the site, enhancing the heritage of the Site, its setting and their setting, providing additional tree lining, public open space;
- Providing development that corresponds to the wider area, including the slipways and the mast pond;
- Integrating surrounding complementary land uses and good road, rail and sustainable transport connections by strengthening linkages to and through the site via a high-quality public realm ensuring footpath, cycle and river connectivity.

2.2.16 In doing the above, the Site can deliver an attractive environment for end users, enhancing Medway's regeneration and placemaking aspirations, which are key to the Local Plan, whilst helping meet housing needs.

2.3 OTHER CONSIDERATIONS

Public Rights of Way

2.3.1 There are no known Public Rights of Way that affect the Site.

Flood Risk

2.3.2 The Site is at risk of tidal flooding from the River Medway. Mitigation measures such as the height of ground floor levels, and no habitable living accommodation have been considered in the initial design approaches which have previously been discussed with the Council. This could also be specified in any Strategic Planning Policy that looks to allocate the Site for residential-led development in the emerging Local Plan.

Contamination

2.3.3 The Site is a brownfield site that has been cleared of buildings. Any necessary contamination assessments and appropriate mitigation measures can be put in place.

Heritage Assets

2.3.4 The Site lies within the Chatham Historic Dockyard Conservation Area. There are a number of Grade II, Grade II*, Grade I and Scheduled Ancient Monuments within the settings of the Site. The assets of particular importance for the Site is set out below:

- The original 18th Century Dockyard;
- Lowermost House, number eight slip and public house;
- Converted slip buildings;
- Slipway; and
- Mast Pond.

2.3.5 It is acknowledged that the design layout and massing of any development on the Site should take account for the character of the Conservation Area and should

achieve a high-quality design that will preserve and enhance the area's historic and architectural character and appearance.

Archaeology

2.3.6 Any necessary archaeological investigations will be undertaken to ensure appropriate mitigation measures can be put in place.

Biodiversity Net Gain

2.3.7 It is understood that there are some habitats of importance on the Site which may prove difficult to replace elsewhere. This is therefore likely to impact the viability of the scheme more so than currently and may limit the affordable housing provision or developer contributions.

Deliverability, Availability And Suitability

2.3.8 For a site to be considered deliverable, it needs to be available, suitable and achievable. These tests for site CCB25 are reviewed below.

Availability

2.3.9 Availability is essentially confirming that the Site is financially viable to develop. The Site is currently allocated in conjunction with the Brunel Site (CCB35) for residential-led development in the adopted Local Plan (2003). Vistry Group currently have an option agreement to develop the Site.

2.3.10 The Site currently has a development brief and this should be updated through the emerging Local Plan to reflect changing legislation regarding BNG and advise on heritage.

2.3.11 Given the nature of the Site and its availability it is considered the 151 residential units could start to be delivered within the first five years of the plan.

2.3.12 However should the Site be allocated for non-residential development, as the draft Local Plan currently does, it would not be viable and the Site would not be available.

Suitability

2.3.13 For reasons set out in this representation, the Site is considered a suitable and sustainable location for development, making the best use of previously developed land to deliver housing need.

2.3.14 Residential development on this Site would make an important contribution to the required housing supply for the plan period for Medway given that the Council

need to release more housing sites to meet their own unmet housing needs as well as those of neighbouring authorities.

Achievability

2.3.15 As discussed throughout this representation, additional housing needs will be required throughout the plan period and the redevelopment of brownfield sites forms part of all three spatial growth strategies which this Site will achieve. The redevelopment of the riverside site would provide the opportunity to maintain an existing allocation for residential led development that is achievable over the next plan period and will make an important contribution in meeting Medway's housing needs.

2.4 SUMMARY

2.4.1 Site CCB25 is promoted through these representations as an existing brownfield allocated Ste which should be retained in the next Local Plan for residential development as it is available, suitable and achievable. It would make the most effective use of land in accordance with NPPF para 123 and boost the supply of homes in accordance with NPPF para 60.

2.4.2 The Site has been allocated for employment purposes in the draft Local Plan, however this appears erroneous and would render the Site undevelopable as it would not be viable and therefore not available, suitable or achievable for employment development.

2.5 COMMENTARY ON THE INTERIM SUSTAINABILITY APPRAISAL OF THE DRAFT LOCAL PLAN

2.5.1 Volume 1 of the Interim Sustainability Appraisal (ISA) at Table 8.15 outlines the reasons for the selection and rejection of reasonable alternative strategic sites for the Draft Local Plan. Our client's Site, CCB25 has been selected for development the following reasons:

The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.

2.5.2 We would agree with the above summary for the Site for a residential development; however it is still unclear as to why the Site has been allocated for non-residential development, and there is no justification for doing so. Volume 2 of the ISA includes a Sustainability Assessment of the Site of non-residential

development, however as discussed the Site is not suitable for non-residential purposes. Therefore, to assist the council in its assessment, the ISA assessment has been completed for the Site for the purposes of residential-led development and is set out below.

SA Objective 1 – Climate Change Mitigation		
Site Ref.	Site use	Carbon Footprint
CCB25	Residential	+/-

SA Objective 2 – Climate Change Adaptation				
Site Ref.	Site use	Flood Zones	SWFR	Flood Defences
CCB25	Residential	--	-	0

SA Objective 3 – Biodiversity and Geodiversity											
Site Ref.	Site use	European Sites	SSSI	NNR	Ancient Woodland	LNR	LWS	MCZ	Priority Habitats	RIGGS	Open Mosaic Habitat
CCB25	Residential	-	-	0	0	0	0	-	0	0	-

2.5.3 As identified in the ISA assessment, part of the Site does comprise Open Mosaic Habitat. An Open Mosaic Habitat Assessment (OMHA) for both Site CCB25 and CCB35 has therefore been undertaken to provide a further understanding of these habitats and any impact this may have on redevelopment. This OMHA can be found at Appendix 2.

2.5.4 The OMHA concludes that whilst there are areas of OMH on both sites which form important ecological features due to their habitat status, neither are considered to be important outside of a local context. Given the nature of the habitats present it is concluded that similar areas could be fairly readily recreated if these areas of OMH were to be lost as a result of development.

2.5.5 The presence of this OMH is therefore not considered to be an overriding constraint to development and would not impact upon the sites deliverability. It therefore remains suitable for residential-led allocation.

SA Objective 4 – Landscape

Site Ref.	Site use	Kent Downs AONB	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	View from the PRoW Network	Views Experienced by local residents	Coalescence /urbanisation of the countryside
CCB25	Residential	0	0	0	+/-	+/-	-	0	0

SA Objective 5 – Pollution								
Site Ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
CCB25	Residential	0	-	0	-	0	0	+/-

2.5.6 As set out within the assessment, the Site is not in an AQMA and is over 200m from an AQMA. The Site originally scored poorly for air pollution as it was considered to be a development proposal which could potentially result in a significant increase in air pollution. This is due to it being assessed for non-residential development. On the basis of this being a residential-led development, this classification has been updated to confirm the development would be expected to result in a negligible increase in air pollution. The Site is in a highly sustainable location where it is anticipated most future residents would use sustainable forms of travel (as reflected in its assessment for SA Objective 10), with limited parking provision proposed to reflect this, limiting car usage. Future residential-led development on Site would therefore have a negligible impact on air pollution.

SA Objective 6 – Natural Resources				
Site Ref.	Site use	Previously Undeveloped Land	ALC	MSA
CCB25	Residential	+	0	0

SA Objective 7 – Housing		
Site Ref.	Site use	Housing
CCB25	Residential	++

2.5.7 As set out throughout this representation it is considered that Site CCB25 has erroneously been assessed for non-residential development. The Site is capable of accommodating 151 dwellings and therefore would result in a significant net gain in housing, this has therefore been reflected above.

SA Objective 8 – Health and Wellbeing							
Site Ref.	Site use	NHS Hospital	GP Surgery	Leisure Facilities	Access to public greenspace	Net loss of public greenspace	PRoW/Cycle Network
CCB25	Residential	+	-	+	+	0	+

SA Objective 9 – Cultural Heritage							
Site Ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
CCB25	Residential	--	-	-	-	-	0

SA Objective 10 – Railway Station						
Site Ref.	Site use	Bus stop	Railway station	Pedestrian/cycle access	Local services	Public transport accessibility
CCB25	Residential	+	+	+	+	++

SA Objective 11 – Education				
Site Ref.	Site use	Primary School	Secondary School	Further Education
CCB25	Residential	-	-	+

SA Objective 12 – Economy & Employment			
Site Ref.	Site use	Employment Floorspace Provision	Access to major employment location
CCB25	Residential	0	+

2.5.8 The ISA assesses the Site as resulting in a significant net increase in employment floorspace, however there is no commentary within the document on how much employment floorspace is estimated to be generated by the proposals. Irrespective of this the Site is not considered suitable for non-residential use.

2.6 SUMMARY

2.6.1 As demonstrated in the above re-assessment, Site CCB25 continues to score highly when proposed for residential-led development. The identified constraints remain the same and do not worsen with residential-led development, and in some

instances, the proposed residential-led use improves the overall scoring of the Site. The assessment findings for the Site (referenced in para 2.5.1 above) therefore remain the same.

2.6.2 On the whole, the scoring within the ISA assessment hasn't largely changed, and remains on par with the results of other similar residential developments. This continues to demonstrate the Site's suitability for residential-led development.

3 VISION

3.1 COMMENTS ON THE PROPOSED VISION

3.1.1 The "Vision" for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.

3.1.2 The "Vision" seeks to provide more sustainable and resilient development and strengthen and enhance Medway's character, including supporting green infrastructure, creating a healthy place to live and work, and providing decent places to live for all sectors and ages of the community. It further highlights Medway as a leading economic player in the region, where it can support the business space and attract new investment. Alongside development, there should also be improved travel choices and infrastructure.

3.1.3 However, the "Vision" is silent on its intention to meet its identified housing need and on its intention to address economic/employment needs. Indeed, the overarching principles for the "Vision" fail to identify housing at all as an important component of the Plan.

3.1.4 Whilst the "Vision" talks in general terms about how development is to be provided, central to the "Vision" must be "how much development is provided" as a matter that is fundamental to the framework for growth and spatial strategy as a determinative matter. This is a significant failing, considering the "Context" identifies "the supply of new homes is central to the Local Plan" (para 1.2.8).

3.1.5 The vision further does not say how it will achieve growth. The basis for all three growth strategies within the plan supports the regeneration of previously developed land however the vision is absent in referring to this. More specific aims are therefore required to be dealt with in the vision.

3.1.6 NPPF (para 15) states that:

> *The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a* ***framework for addressing housing needs*** *and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*

3.1.7 In the absence of the "Vision" setting out its intention of how much development will be delivered, specifically housing development, it does not provide a positive framework for addressing housing need contrary to the NPPF (para 15). This failing is further perpetrated by the "Strategic Objectives" (see Section 3 of this Statement), which also does not address the scale of housing provision that should

be delivered, contrary to the NPPF (para 20). This underlines the importance of the" Vision", setting out the intentions for growth.

3.1.8 The "Vision" as set out in section 2.1 must be amended as follows (new test in red):

> *Medway has conserved and enhanced its intrinsic cultural and natural heritage and landscapes alongside high quality development to strengthen the area's distinctive character. Medway has achieved sustainable growth through the development of housing, transport, environment, retail, employment and waste and minerals sites that have responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, and reducing and mitigating the risks of flooding, overheating, drought and soil erosion.*

3.1.9 As per our client's previous representation in October 2023, a new paragraph must still be added, or existing paragraphs amended as part of the "Vision" to set out the intention of the Local Plan to meet identified housing and employment needs. The 7th paragraph (un-numbered) could be amended as follows:

> *The Plan will seek to deliver 26,528 new homes to ensure the needs of all sections and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported house building to provide a good quality of life for residents.*

3.1.10 The proposed change aligns with the "Development Needs" (set out in the executive summary of the draft Local Plan), which sets out the approximate housing target of 28,000 homes to be delivered across the Plan Period.

3.1.11 However, as identified throughout this Representation, 26,528 homes is the minimum, and it is considered that the Council need to allocate additional housing sites in order to meet their needs throughout the plan period.

3.1.12 The outline changes are essential to ensure the Plan is "Positively Prepared", "Consistent with National Policy", and therefore "Sound" (NPPF, para 35).

3.2 SUMMARY

3.2.1 The vision does not identify the provision of housing and employment as an important component of the Plan, and does not set out how much development should be provided for, as required by NPPF para 15 . It further fails to confirm how this will be achieved, not mentioning the regeneration of previously developed land, which underpins all three growth strategies.

3.2.2 This is a central component of the plan and a determinative matter for the spatial strategy. In not expressing the amount of development that is to be delivered, the Plan also fails to be positively prepared to provide a suitable framework for addressing housing needs.

4 STRATEGIC OBJECTIVES

4.1 COMMENTS ON THE STRATEGIC OBJECTIVES

4.1.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:

- Prepared for a sustainable and green future
- Supporting people to lead healthy lives and strengthening our communities
- Securing jobs and developing skills for a competitive economy
- Boost pride in Medway through quality and resilient development

4.1.2 The strategic objectives, including their sub-objectives, have not materially changed since the previous Regulation 18 consultation. Therefore, our client's concerns remain the same as those previously submitted and are outlined below.

4.1.3 Para 2.2.1 within the plan sets out that these objectives will "*feed into the wording of policies and how sites and different locations are assessed for potential development*". It is therefore notable that there is no strategic objective dealing expressly with the amount of housing that needs to be delivered.

4.1.4 Whilst it is acknowledged that in general terms the objective of "*Supporting people to lead healthy lives and strengthening our communities*" mentions in general terms the types of housing to be delivered, it does not set out how much. This is a determining factor in deciding what is the most appropriate spatial strategy and should inform the basis of future strategic policies, as required by the NPPF (para 20 and 23). In accordance with the NPPF (para 11), this should also reflect, as a minimum, the objectively assessed need.

4.1.5 In the absence of clearly setting out the housing requirement and whether the Plan is looking to meet its need (which it should), the process of using the stated objectives to inform the Council's assessment of different sites and locations for development cannot be considered "Positively Prepared" or "Justified," contrary to the NPPF (para 35).

4.1.6 The "Strategic Objectives" must, therefore, be either expanded to include the amount of housing that is to be planned for, which must reflect the objectively assessed need as a minimum (NPPF, para 11b), or a new objective added that identifies this.

4.1.7 The principles are supported for the spatial objectives more generally. However, they further highlight the need for the amount of development to be planned to

be expressed as an objective since many of the other objectives are dependent on the delivery of housing, including the ambitions for improved employment floorspace and higher-value employment opportunities, which are also reliant on providing enough housing.

4.1.8 The objectives discuss development on brownfield land as part of its regeneration objectives, which is supported as this underpins the Council's preferred spatial growth option.

4.2 SUMMARY

4.2.1 The strategic objectives as currently drafted do not provide a "Sound" basis to inform the development strategy, site selection or future planning policies, where they fail to set out the amount of development that is to be planned for. This is fundamental to informing the spatial strategy and policy making, especially in respect of setting strategic policies (NPPF, para 20). The objectives must therefore either be expanded or a new objective added which sets out that the Plan seeks to deliver its full objectively assessed need as a minimum (NPPF, para 11b).

5 SPATIAL GROWTH OPTIONS

5.1 HOUSING SUPPLY AND DEVELOPMENT NEEDS

5.1.1 The Government's Standard Method sets out a requirement of 1,658 homes pa for Medway. The Interim Sustainability Appraisal sets out that this results in a housing need of 26,528 homes across the Plan Period, 27,854 homes accounting for the 5% uplift. This equates to a 16 year plan period.

5.1.2 Whilst our client supports the Council's ambition to meet its overall housing need, NPPF para 69a requires the plan to cover a period of at least 15 years from adoption. Whilst the plan appears to cover this, across a period of 16 years, this provides little flexibility should Plan preparations stall or examination be delayed, meaning it would fall short of the required 15 years. Indeed, the Council's published Local Development Scheme (Feb 2024) does not anticipate adoption of the Local Plan until Autum 2026. At this point the Plan would only have 15yrs left, allowing for no slippage, which is highly unlikely.

5.1.3 Therefore, in order for the Plan to be considered "Positively Prepared" and therefore "Sound" the Plan period must be extended by a least a further year to provide flexibility and to cover inevitable delays in adoption, to ensure it is "Consistent with National Policy".

5.1.4 The Plan period should therefore be increased to at least 17 years, with a requirements for at least 29,595 new homes, including the 5% buffer.

5.1.5 As evidenced in Table 5.1, the Council has consistently failed to deliver against its housing requirement since 1986, with it last meeting its requirement in only two years back in 2008/09 and 2009/10. This has no doubt led to the current acute shortage of housing in Medway and the current identified need. During this time, the need for affordable housing has also become even more acute, with an identified annual need for 870 affordable homes pa (Medway Local Housing Needs Assessment, October 2021, prepared by Arc4).

Summary of Historic Housing Delivery in Medway			
Year	**Completions**	**Requirement (at that time)**	**Difference**
1986/87	1,118	1160	-42
1987/88	821	1160	-339
1988/89	1,454	1160	294
1989/90	1,467	1160	307
1990/91	391	1160	-769
1991/92	825	900	-75
1992/93	769	900	-131
1993/94	669	900	-231

1994/95	546	900	-354
1995/96	644	900	-256
1996/97	598	900	-302
1997/98	702	900	-198
1998/99	698	900	-202
1999/20	719	900	-181
2000/01	603	700	-97
2001/02	603	700	-97
2002/03	676	700	-24
2003/04	733	700	+33
2004/05	646	700	-54
2005/06	562	700	-138
2006/07	591	815	-224
2007/08	761	815	-54
2008/09	914	815	99
2009/10	972	815	157
2010/11	657	815	-158
2011/12	809	815	-6
2012/13	556	815	-259
2013/14	579	1000	-421
2014/15	483	1,000	-517
2015/16	553	1,000	-447
2016/17	642	1,000	-358
2017/18	680	1,334	-654
2018/19	647	1,683	-1,036
2019/20	1,130	1,662	-532
2020/21	1,087	1,586	-504
2021/22	1,102	1,657	-573
2022/23	1,049	1,658	-609
1986/87-2022/23	**28,465**	**37,385**	**-8,929**

TABLE 5.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

5.1.6 The Local Housing Needs Assessment and Table 5.1 identified a need for both market and affordable housing, emphasising the need for the Council to plan to meet its full objectively assessed need (28,183 homes pa) in full , as required by the NPPF (para 11b and para 23), supporting the Government's objectives to significantly boost the supply of homes (NPPF, para 60).

5.2 MEETING NEIGHBOURING AUTHORITIES' UNMET NEED

5.2.1 The Council also needs to consider paragraphs 11 and 60 of the NPPF to determine whether unmet needs arise in neighbouring areas (Gravesham Borough Council

and Tonbridge Malling Borough Council) and whether additional land can be identified to meet some of those housing needs.

5.2.2 It is noted that Gravesham Borough Council, through its previous Regulation 18 consultation, asked Medway to take 2,000 homes to assist it in meeting its housing need. Under the July 24 draft NPPF consultation the outcome for the revised methods of housing calculation were published. It set out that Gravesham needed to provide an additional 32 homes on top of its 661 homes pa target (693).

5.2.3 Tonbridge and Malling need an uplift of 237 homes pa on top of the existing Standard Method calculation taking their total supply pa to 1,057 homes pa.

5.2.4 This is the most recent figure set out in the Gravesham Borough Council (GBC) Regulation 18, however it is not known whether there is a more up-to-date figure supplied by GBC as no statement on the duty to co-operate or updated Statement of Common Ground (SoCG) has been published. An updated SoCG will be need between both MC and the neighbouring authorities, in order to understand whether or not the Council can and would be willing to address these unmet needs of neighbouring authorities within Medway.

5.2.5 Therefore, it is even more pressing that the Council plans to meet its housing objective in full since this could contribute to a worsening housing supply and affordability if there is consistent under delivery of housing in this part of Kent (if Gravesham does not meet its needs). Medway Council should, therefore, work with Gravesham Borough Council to determine if it needs to and/or can accommodate any of its needs to ensure the Plan is "Positively Prepared" (NPPF, para 35).

5.2.6 As a minimum, the objective to meet the objectively assessed need in full is supported, as required by National policy, with the Council to explore further whether it also needs to plan to meet any needs arising from Gravesham Borough Council or any other Council's (as appropriate) i.e. Tonbridge & Malling, which also borders Medway.

5.3 DRAFT NPPF CONSULTATION AND WRITTEN MINISTERIAL STATEMENT

5.3.1 The Government's proposed reforms to the NPPF (as well as other changes to the Planning System) were announced on 30 July 2024 with the publishing of the draft NPPF which is being consulted on until 24 September 2024.

5.3.2 The draft NPPF was accompanied by a Written Ministerial Statement (WMS) titled 'Building the homes we need', which sets out how the Government is seeking to encourage housebuilding. The WMS sits alongside the draft NPPF and provides specific planning mechanisms to encourage housebuilding and removes exceptions to the application of the presumption, including the removal of Paragraph 226 (i.e., the 4 Year Housing Land Supply exception). Under the revised

NPPF, the threshold for the application of the presumption will return to the 5 Year HLS requirement (as well as the Housing Delivery Test requirement).

5.3.3 Within the WMS, the Housing Secretary is clear that the 'Standard Method' currently utilised is *"insufficient to deliver on our scale of ambition"* and is *"not up to the job"*, therefore the Government have proposed a 'Revised Method' which requires Local Authorities to plan for numbers of homes that are proportionate to the size of existing housing stock. In this regard, MC under the Standard Method are required to deliver 1,658 dwellings per annum, whereas under the Revised Method, they are required to deliver 1,644 dwellings per annum, which stands as a decrease in the requirement by 14 dwellings, which is not considered to be significant reduction considering the overall total number of dwelling MC require to deliver per annum.

5.4 PREFERRED SPATIAL GROWTH OPTIONS

5.4.1 The plan sets out three Spatial Growth Options (SGOs) for Medway. SGO3 is MC's preferred option at this stage which is a 'blended strategy' which incorporates brownfield regeneration and greenfield sites. The SA states that SGO 3 can provide 23,733 homes over the plan period. Added with the circa 4,000 to be delivered by windfall sites and those with extant planning permission, the expected supply of homes across the plan period would be circa 27,700 which is approximately 4% more than the 26,528 homes required across the proposed plan period, however almost 500 homes short of housing need across a policy compliant plan period.

5.4.2 SG03 is supported, however given the Council's existing and proposed unmet need for market and affordable homes in Medway, and over 2,000 homes of unmet need in the neighbouring authorities of GBC and TMBC, it is considered that MC need to allocate additional sites within the administrative area to meet their local housing need and unmet need from neighbouring authorities. As such, MC need to consider releasing further housing sites. As demonstrated in section 2, site allocation CCB25 is not suitable for an employment allocation and should be allocated for residential-led development to meet this need.

6 NATURAL ENVIRONMENT

6.1 POLICY S1: PLANNING FOR CLIMATE CHANGE

6.1.1 The Council's draft viability study has policy S1 labelled as a 'Vision for Medway in 2037'. Policy S1 in the Regulation 18 consultation document is labelled Planning for Climate Change. The current Policy S1 sets out measures to mitigate the impacts of climate change. There are clear discrepancies between the draft Viability Report and the current consultation document as it does not currently consider the implications for planning for Climate Change and the measures set out above in the consultation document under policy S1.

6.1.2 Our client supports the Council in mitigating and addressing the impacts of climate change. The viability study, however, does not appear to consider the proposed climate change considerations set out in policy S1 above, which should be reviewed.

Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?

6.1.3 The Council's preferred approach to achieve this is to have new homes achieve a 31% carbon reduction, which is equivalent to the Future Homes Standard (FHS) option 2. The Viability Report however states at paragraph 10.47 that this would increase build costs by 3.1%. For development sites on brownfield land, where there are already higher construction costs, these additional climate change targets will add to these costs and could impact the delivery of development on previously developed land, which underpins the Council's SGO3 strategy.

6.1.4 Our client therefore considers that the Council should not go beyond national policy/regulations in addressing climate change. This is because national policy and regulations are continually changing adapting to new and different concerns. For example, the Future Homes Standard (FHS) is anticipated to launch in 2025. The technical consultation on the proposed specification of the FHS took place in Spring 2023; further consultation is to take place throughout 2024, followed by the adoption of the regulations in 2025. From 2025, compliance with the FHS will become mandatory and will ensure that new homes built from 2025 will produce 75-80% less carbon emissions than those constructed under current Building Regulations. The FHS seeks to decarbonise new homes by improving heating and hot water systems and reducing heat waste.

6.1.5 Notwithstanding the above, it is noted that the FHS has yet to be adopted. Significant concerns and risks were raised in the technical consultation relating to the impact of the increased costs of implementing the FHS on house prices and

building costs. In turn, there is a chance that the full impact of achieving net zero could filter through into the viability and subsequent delivery of new schemes. It would, therefore, be prudent for the viability assessment to be re-run, including the scenario within which the FHS is implemented and considering any government funding to ensure that new development is able to achieve net carbon zero and remain viable.

6.1.6 The PPG provides guidance in respect of climate change and specifically addresses whether Local Planning Authorities can set higher energy performance standards than building regulations in their Local Plan. The PPG specifically states that authorities "can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes". (para 012 Ref ID: 6-012-20190315). Should the requirements of Policy S1 exceed the requirements for Code Level 4, then this is not "Consistent with National Planning Policy".

6.1.7 Given the reasons set out above and the example of the FHS we consider that the Council should work policy S1 in a way that is flexible and adaptable enough to meet the ever-evolving requirements of national policy when it comes to meeting the challenges of climate change. The Council do not want to be over reliant on policy in the future that is out of date with the current national policy at any particular one time.

6.2 POLICY S2: CONSERVATION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT

6.2.1 Policy S2 should remain as is, with proposals only having to demonstrate a 10% net gain in accordance with the Environment Act, 2021.

Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?

6.2.2 Whilst BNG is supported, the Environment Act 2021 has already introduced a mandatory BNG requirement. The Local Plan is absent of any evidence to justify moving towards BNG over and above statutory requirements.

6.2.3 Whilst the supporting Viability Assessment considers BNG in broad terms, it does not and cannot take into account additional land requirements which might result from this increased standard which will be dictated on a site-by-site basis and could significantly reduce the development potential of sites. This can have significant spatial implications in terms of what can be delivered on site, including the overall quantum of development that can be achieved. It can further

significantly reduce the capacity of sites, undermining housing delivery as well as the Council's spatial strategy. As such the Plan would fail to be "Effective".

6.2.4 Where the increase gain cannot be met on site, the Viability Assessment further fails to take into account the additional and cost and delay associated with securing suitable off-site measures.

6.2.5 On brownfield sites in particular, such as Chatham Interface, which already have higher costs, delivering biodiversity net gain above the statutory minimum requirement would be considered to add to these additional costs, causing viability issues for brownfield sites as a whole. This can be a significant burdensome cost which fails to be taken into account in the Council's evidence.

6.2.6 The PPG (Para: 006 Ref ID: 74-006-20240214) is clear in stating that:

> *"Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented."*

6.2.7 An enhanced requirement would significantly risk the delivery of the Local Plan and planned levels of housing, likely requiring additional sites to be identified to meet housing needs.

6.2.8 The Plan therefore should not go beyond the statutory 10% requirements. As this would not be "Positively Prepared", "Justified" or "Effective".

6.3 POLICY S3: NORTH KENT ESTUARY AND MARSHES DESIGNATED SITES

6.3.1 Policy S3 is similar to that currently implemented by the Council through developer contributions as part of any planning application within the zone of influence of the identified areas set out within the policy. Therefore, our client does not object to its premise.

Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated

SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

6.3.2 Our client does not object to the tariff-based approach applied to development within 6 km of designated areas. Medway Council already has SAMMS payment as part of the development contributions to a section 106 agreement or CIL contribution. The contributions are currently clearly set out within the Developer Contributions Guide, which gets updated annually, and this policy will formalise the existing approach in the Local Plan.

6.4 POLICY DM1: FLOOD AND WATER MANAGEMENT

6.4.1 Policy DM1, as drafted, is aligned with the NPPF. Part of the policy is subtitled "Water quality and groundwater protection," and it requires proposals to comply with the Thames River Basin District Management Plan. The protection of water quality is important. However, Medway should adopt this document as a Supplementary Planning Document as part of its evidence base to help developers and applicants understand what the requirements are. Alternatively, the policy should set out the requirements to meet the measures set out in the Thames River Basin District Management Plan.

6.5 POLICY DM2: CONTAMINATED LAND

6.5.1 The policy sets out high-level principles of how the Council will seek developments to deal with land contamination and potential risks to human health and the environment. At the Regulation 19 stage of the Plan, the Council should set out what supporting evidence is required to be submitted as part of any planning application submitted for major developments.

6.6 POLICY DM3: AIR QUALITY

6.6.1 Any future draft policy at the Regulation 19 stage of the Local Plan process needs to set out the criteria for which development is required to submit such information, i.e., any major planning applications, any applications within an Air Quality Management Area, or other criteria that the Council may consider appropriate. This will clarify what technical information is required at any future planning application stage on our client's site.

7 BUILT ENVIRONMENT

7.1 POLICY T1: PROMOTING HIGH QUALITY DESIGN

7.1.1 The Policy, as currently drafted, provides a checklist for designing high-quality developments that are reflective of the requirements set out in the NPPF. There are no in principle objections to this policy, however the policy sets out certain sustainability criteria that should be met i.e.;

(1) Meeting the BREEAM standard of 'Very Good' for both energy and water efficiency; and

(2) Biodiversity 2020, and Building with Nature Standards

7.1.2 These requirements discuss topics of well-being, water, and wildlife and so aren't considered best placed in a policy regarding high quality design. In addition, concerns area raised regarding the requirement for all developments to meet the BREEAM 'Very Good' standard for energy and water efficiency as these are requirements currently set out in the Building Regulations so have to be complied with. Therefore, there is limited justification as to why they are being replicated in planning policy.

7.2 POLICY DM5: HOUSING DESIGN

7.2.1 Concerns are raised regarding the policy stating that no more than 5% north-facing single-aspect homes within any one development will be considered. Whilst it is noted the premise of this policy is to ensure the provision of sufficient natural light in accordance with para 135(f) of the NPPF, to create places that are of a high standard of amenity for existing and future users, there is no evidence to support why the Council has come to this conclusion and figure.

7.2.2 This is a limitation on future developments and could have an impact on the efficiency of certain sites, limiting the amount of development that could be delivered. This is a concern that isn't supported by any robust evidence and so should be removed as a requirement.

7.2.3 The last bullet point of the policy seeks a design for flexible living: successful places that are robust and support long life and loose fit' neighbourhoods that are flexible and adaptable to rapidly changing circumstances. Our client has concerns regarding the deliverability of this part of the policy. What standards does the Council intend to apply to help determine whether something is flexible living, and what are the key design criteria for long-life and loose-fit neighbourhoods? The Council should consider the production of the Supplementary Planning Document (SPD) or details within a Design Code to clearly set out how they wish housing standards to meet such fluid design criteria to help applicants understand

what is required of a planning application which may help facilitate the long life and loose fit neighbourhoods set out in the policy.

7.2.4 Ultimately, this policy's last part currently appears intangible. The Council needs to provide further guidance about how long-life and loose-fit neighbourhoods will manifest themselves in the Medway towns.

8 ECONOMIC DEVELOPMENT

8.1 POLICY S12: NEW EMPLOYMENT SITES

8.1.1 Policy S12 discusses new employment sites, and states that new employment sites will be allocated to meet the needs set out in the latest Employment Needs Assessment, this however has not yet been published.

8.1.2 There is therefore no evidence provided to justify the allocation of Site CCB25 for non-residential development. Our client therefore objects to this policy on the basis that there is no information to support the allocated non-residential sites as identified within the accompanying policies map.

8.1.3 As set out throughout this representation, it is considered that Site CCB25 has been included as non-residential in error and should be allocated for residential-led development.

9 CONCLUSIONS

9.1 OVERALL SUMMARY

9.1.1 The Council have persistently under delivered against its housing requirement, resulting in a significant need for both market and affordable housing. The plan currently does not meet its full objectively assessed need, and the plan period should be extended to at least 2042 to ensure it covers the requires 15 years at the point of adoption. The Council therefore need to allocate additional housing sites in order to meet these needs.

9.1.2 The "Vision" should be amended to include reference to housing. Whilst the "Vision" in general is supported, it is a significant failing that it does not mention the delivery of housing, a significant element of the Plan. In not addressing the need to deliver housing as an integral part of the "Vision" it fails to accord with the NPPF (para 15).

9.1.3 Whilst the "Vision" in general is supported, it is a significant failing that it does not mention the delivery of housing, a significant element of the Plan. In not addressing the need to deliver housing as an integral part of the "Vision" it fails to accord with the NPPF (para 15).

9.1.4 There is no evidence within the plan to support the non-residential allocations. Site CCB25 has been allocated for non-residential development despite being promoted for residential-led development, and having been allocated for residential-led development in the Medway Local Plan (2003). It therefore should be allocated for residential-led development within the Regulation 19 Local Plan.

9.2 CONCLUSION

9.2.1 Site CCB25 is sustainable, achievable and deliverable for residential-led development within the first 5 years of the Local Plan. The Site can help meet the identified housing needs of Medway and aligns with all three development strategies to make use of previously developed land.

9.2.2 Site CCB25 has been wrongly allocated as non-residential development despite being previously allocated, and consistently promoted for residential-led development. As demonstrated through this representation, there is no supporting evidence that justifies this non-residential allocation.

9.2.3 Therefore, Site CCB25 should be allocation in the draft Regulation 19 Local Plan for residential-led development for circa 151 dwellings.

APPENDIX
1

Pre-Application Advice Response

	Site Address: Chatham Interface Land, Historic Dockyard, Chatham, ME4 4TE	**Ref No:** PRE/23/0587
	Our description of your proposal: Construction of up to 259 dwellings spread across flat and house typologies, in buildings up to five storeys, including potential ground floor commercial space, landscape and river frontage improvements with associated parking.	
	Main Considerations **<u>Principle</u>** The Riverside and Brunel site is located within the wider Chatham Maritime Regeneration Area as defined by the Medway Local Plan (2003) and are therefore deemed suitable in principle for development. The adopted Chatham Interface Land Development Brief (June 2018) also supports the development of this key regeneration site and in doing so identifies the potential for a residential-led development with opportunities for supporting mixed uses. Relevant adopted policies relating to Chatham Maritime are shown below. **Chatham Maritime Policy S8: Chatham Maritime Mixed Use Zone** Development will: Include a factory outlet centre (retail), Class B1 offices, a hotel, land and water-based leisure uses and housing. Tourist facilities and Class A3 uses of a scale commensurate with their location will also be appropriate. Create a new transportation framework for the sites, including improved public transport, cycling and pedestrian links to Chatham and Gillingham town centres with a key objective of reducing the need to travel by the private car. Promote high quality and innovative design approaches to create a high quality and vibrant environment. Promote development which is complementary to the Chatham Historic Dockyard in order to maximise visitor appeal and integrate the site with the wider environment. **Chatham Maritime Policy S9: Chatham Historic Dockyard** 'At the Historic Dockyard development that respects the historic character of the site will be permitted. The standard of urban design must be of the highest order'. **Education Policy CF7: Further, Higher and Adult Education** 'Expansion of the existing campuses at Chatham Maritime and Chatham Historic Dockyard will be permitted' **<u>Summary of Heritage Policies in Medway Local Plan</u>** **BNE12 – Conservation Areas** Special attention will be paid to the preservation and enhancement of the character and appearance of Conservation Areas.	

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BNE14 – Development in Conservation Areas
Development within Conservation Areas, or affecting their setting, should achieve a high quality of design which will preserve or enhance the area's historic or architectural character or appearance. Criteria relating to built form, layout, building materials and appearance, streetscape and hard and soft landscaping are set out in the full policy.

BNE18 – Setting of Listed Buildings
Development which would adversely affect the setting of a listed building will not be permitted.

BNE 20 – Scheduled Ancient Monuments
Development affecting Scheduled Ancient Monuments or other nationally important sites will not be permitted if it would damage or destroy such sites, or be detrimental to their setting

BNE 21 – Archaeological Sites
Development affecting potentially important archaeological sites will not be permitted, unless:
• The developer, after consultation with the archaeological officer, has arranged for an archaeological field evaluation to be carried out by an approved archaeological body before any decision on the planning application is made;
• It would not lead to the damage or destruction of important archaeological remains. There will be a preference for the preservation of important archaeological remains in situ;
• Where development would be damaging to archaeological remains, sufficient time and resources are made available for an appropriate archaeological investigation undertaken by an approved archaeological body. Such investigations should be in advance of development and in accordance with a specification and programme of work approved by the council. Resources should also be made available for the publication of the results of the investigation.

Design and Landscape

These important and prominent sites have the potential to create a new benchmark for future place-making and residential led mixed use development, providing a key part in the success of Medway's future growth. In response to the pre-application document submitted the following points were raised during initial discussions regarding the proposal.

The Brunel site has an important relationship with the Police Section House (Section House), and therefore this heritage asset needs to stand alone, the apartment blocks shown on the indicative plans should therefore be subservient to the Section House. This could manifest by reducing the height of the apartment blocks by a storey or perhaps changing the typology, albeit it is understood the decision to proceed with flats is linked to viability. The relationship between the apartment blocks and Section House will be discussed in more detail as the design evolves.

The repetitive nature and roof lines of the proposed buildings picks up on the rhythm of the previous structures on site, and whilst the overall built form and layout is a good starting point the mast pond does present some challenges with respect to the geometries of the layout (Brunel Site) and the appreciation of the Section House. The mast pond is at an angle to the main route through the Brunel Site, and as such opportunities to better reveal the significance, and connection between the mast

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pond and Section House should be explored. At present this route feels a little narrow, and there is a placemaking opportunity to better frame the Section House in this context.

As discussed during the meeting, and in respect to the Riverside site, there are different ways of approaching the relationship with the covered slips. One option would be to continue the tradition of technological innovation and iconic built form to produce a distinctive tower block. However, it is noted from the indicative proposal presented that this approach has not been taken and instead the massing is more conservative to give prominence to the slips. The lower rise typologies on the Riverside site is an equally valid approach and in turn would address previous concerns raised from Historic England that a larger and taller form of development could compete with the covered slips. However, the architectural language and materiality of the buildings would need to be carefully considered and we would expect a significant quality in the materiality and architectural language. There is also an abundance of features to this site that the architecture needs to develop a unique response and identity too, and one that is different to that found at other riverside development sites in Medway.
Whilst there is commercial space that fronts the mast pond (Riverside Site), this could be extended around the side and rear of the apartment block (most northern block) to the riverside frontage to provide a more engaging and active connection to the river, making this area feel more public.

The materiality and landscaping within the Riverside Site, and particularly around the slipway, also needs to be thought through and discussed in more detail, so agreement can be reached on the correct approach for this area. Particularly when considering the historical use of the slipway, and the intended function for this public area.

There is also an interesting relationship at the northern edge of the Brunel plot. The Travelodge building is of a larger scale to the proposed houses. The concern being the proximity and differing relative scale between the existing prominent medium rise hotel building and proposed low rise residential dwellings. This area also transitions into a car park, though is illustrated in (3.3 Aerial View) the character of a wide civic promenade, and how the pedestrian link crossing this site is dealt with would also need to be thought about. The line of existing mature avenue trees following the eastern site boundary provide a potentially valuable placemaking feature and also the means of establishing the residential edge landscape character.

A views analysis is also important and should drive the scheme. All the viewpoints should be considered, including key townscape views and vantage points and these can be discussed and agreed with relevant officers. Initial thoughts have been provided by the Senior Landscape Officer below;

Looking out from Police house northeast and in reverse.

- Tower Hill – Long distance view which engages the wider landscape context and wooded character of Tower Hill, currently and historically occupying the horizon in this view.
    - Out - Consider maintaining the distant wooded horizon above building ridgelines, in this view where possible. This wider landscape character has historic value for the setting of Riverside Site buildings, when viewed from the Section House. Also, a green element above ridgelines, can contribute to a reduced prominence of hardscape within the site, which will prevail generally in the current residential proposals.

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        - Reverse – In addition to Upnor Castle, views towards the Section House may be possible from higher publicly accessible areas of Tower Hill, residential areas of Upnor and also the England Coast Path/Saxon Shore Way.
    - South Pondside Road and Land Adjacent to the Covered Slips – Medium distance view which in the current layout potentially provides one of two unbroken vistas towards the waterfront edge.
    - Section House Frontage – Short distance view which in the current layout is towards a proposed street and over a proposed public space opposite the main building frontage.
        - Consider the location of both end terraces proposed along the new street, particularly regarding their potential for composing the Section House in the vista which would be seen from the proposed public space.
- Looking out from Mast Pond southeast edge.
    - Tower Hill – Long distance view which engages the wider landscape context and wooded character of Tower Hill, currently and historically occupying the horizon in this view.
        - Consider maintaining the distant wooded horizon above the building ridgelines, in this view aligned with the access road and between the proposed residential blocks.
- Looking from elevated footpath north of site towards the proposed development.
    - Footpath approach – Medium distance view through break in structure planting trees.
        - Consider this view from a northern site approach. A potential vista is available due to alignments of the access road separating the proposed residential blocks. The viewpoint location is elevated and offers wayfinding value because of the additional context potentially viewed over Chatham Intra.

Heritage

As discussed during the initial pre-app meeting there are two main heritage considerations;

- The buried archaeology and the potential for this to be of national significance; and
- How the development interacts with the setting of the listed buildings and scheduled monuments.

The design, layout and massing should also take account of the character of the Conservation Area and should achieve a high quality of design which will preserve or enhance the area's historic or architectural character or appearance. This will be largely dictated by the number of Listed Buildings, Scheduled Monuments and the presence of archaeology. Consideration also needs to be given to how the proposed development will alter the general historic industrial-military character of the area and sense of arrival to the Dockyard.

Notwithstanding the points raised above in relation to the flatted blocks and the setting of the Police Section House, more detailed comments with respect to Heritage will be provided by Historic England under a separate cover.

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Archaeology

The NPPF recognises that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance (paragraph 189). The NPPF sets out a significance-led approach to decision taking and describes (paragraph 194) how applicants should describe the significance of any heritage assets affected and that the level of assessment required should be proportionate to the asset's importance.

For heritage assets of archaeological interest, the NPPF requires that developers submit an appropriate desk-based assessment and, where necessary a field evaluation. Because the site has the potential to contain important archaeological remains it is likely that a field evaluation will be required to be submitted as part of any planning application.

The possibility that nationally important archaeology might be present within the application site cannot yet be ruled out. Footnote 68 of the NPPF explains that:

'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'.

In essence, the presumption is that nationally significant archaeological remains should be preserved in situ. Therefore, understanding whether such remains are present – or not – is essential to understanding how development might be accommodated at the site.

It is recognised that in many instances archaeological remains are not of a level of significance whereby Footnote 68 of the NPPF would apply. In such circumstances the NPPF requires (paragraph 203) that decision takers take account the effect of a development on significance and that a balanced judgement will be required.

The ability to record archaeology by excavation should not be a factor in deciding whether or not its loss should be accepted, but if it is so agreed then it is essential that the implications of archaeological investigation (both in terms of cost and programme) are understood and planned for.

The need to deliver an appropriate design response that balances above and below ground heritage issues, alongside other aspects such as townscape and biodiversity is fully acknowledged. As discussed, the northern end of this southern block (Riverside Site) may pose a problem as it is in an area where KCC know there is good presentation of 18th century waterfront archaeology.

Ecology

The most notable ecological features within the site would be the semi-improved grassland, scattered trees, scrub and woodland located along the boundary with Dock Road. The riverside site also contains a large area of improved grassland where there have been previous records of foraging, nesting and overwintering birds. Appropriate ecological surveys will therefore be required and proposals should respond to the results of any survey work and show an appropriate design response to support and enhance on-site ecology. One of the principles of the NPPF is that opportunities to incorporate

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biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity. Consequently, the proposal should also incorporate ecological enhancement opportunities, tree lined streets and demonstrate that biodiversity net gain (BNG) can be achieved through a BNG Feasibility assessment.

Noise, Air Quality and Contamination

The sites are near busy roads and a variety of commercial/industrial type uses and therefore exposure to high noise levels is likely. There may also be noise contributions from use of the river Medway and from Medway City Estate. A noise impact assessment will therefore be required with any application. The scope and methodology used should be agreed with the Environmental Protection (EP) team up front (env.planning@medway.gov.uk). Any proposed commercial uses will also need to be considered, and depending on the nature of these uses they may also need to be included in the noise assessment. Being near busy roads also introduces potential air quality issues for new sensitive receptors as well as impacts on existing levels of air pollution. Therefore, an air quality assessment will also need to be submitted with the application. Again, the scope and methodology used should be agreed with the EP team up front.

Given the historic former uses of the sites a phase 1 contamination desk top study should be submitted with any application.

Affordable Housing

Medway's adopted local plan sets out a requirement for 25% affordable housing, with 60% affordable rent and 40% for intermediate (affordable homeownership of which shared ownership is the preferred option). Where sites are being considered under these policies, a minimum of 25% of affordable homes should be First Homes. 5% of the Affordable Housing should be delivered as wheelchair user dwellings as per part M4 (3) of the Building Regulations.

The affordable units should be physically indistinguishable from the equivalent market homes. Currently, First Homes delivered in Medway are subject to the National Criteria: 30% discount against the market value and a price cap of £250,000 (after the discount is applied). More information regarding First Homes is available from the Councils website;

https://www.medway.gov.uk/firsthomes

In terms of housing need the higher demand is for family sized housing (2 bed +) as opposed to 1 bed units.

Highways

Both sites have reasonable accessibility having regard to the general distance to retail, commercial amenities facilities to the north and some bus services, and Chatham Station located circa 2.3km to the south.

The Riverside Site is bounded by Leviathan Way to the north, Main Gate Road to the east, the River Medway to the west and the covered sips to the south. The site benefits from a single vehicular access

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off Main Gate Road, which is retained to serve the 151 residential units comprising 62 x 1 beds, 48 x 2 beds, 21 x 3 beds and 20 x 4 beds (based on the applicant's submission document).

The Brunel Site which is subdivided into two plots is situated to the west of Dock Road and east of East Road/ car park. Both plots will have access to Brunel Way. The site will accommodate 108 residential units comprising 26 x 1 beds, 31 x 2 beds, 28 x 3 beds and 23 x 4 beds (based on the applicant's submission document).

Transport Assessment

Given the size of the development, any future application should be accompanied by a Transport Assessment (TA), which describes the existing transport conditions in the vicinity of the sites, including the opportunities for walking, cycling and public transport use, as well as an overview of the local highway network - a review of walking and cycling routes (i.e. a non-motorised user (NMU) audit) to key local services and facilities, as well as an audit of the existing public transport service and infrastructure.

The TA should provide a traffic impact analysis of the proposed development on the local highway network, and where appropriate include mitigation measures which could be secured via a S106 contribution/S38/S278 Agreement (Highways Act 1980). Below is the list of the elements that should be covered:

- Traffic flows;
- Traffic Growth;
- Committed Developments;
- Traffic Generation;
- Trip Distribution and Assignment;
- Junction Operational Assessment.

In addition to the above, it is recommended that the junctions capacity test is carried out on the following:

- Pembroke Road/Dock Road Roundabout;
- Brunel Way/Dock Road;
- Main Gate Road/Western Avenue;
- Dock Road/A231 Roundabout;
- Maritime Way Roundabout; and
- A231 Brompton Road/B2004 Prince Arthur Road.

Sustainable Transport Strategy

In accordance with Paragraph 110 of the NPPF, the applicant should consider how opportunities for sustainable travel will be taken up, i.e., the provision of local off-site improvements to walking and cycle infrastructure on local desire lines; the provision of new or improved bus stops; framework Travel Plan; and Car club. Improving pedestrian and cycle connectivity with the rest of Chatham Maritime via the riverside path, and along Brunel Way to the universities, Lower Lines Park, Gillingham, will also need to be considered.

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On Site Pedestrian Access

Pedestrian permeability across the development should be a key feature in the design, with the provision of minimum footway widths of 1.80m (preferably 2.0m), and a maximum speed limit of 20mph through the estate and enforced by traffic calming measures, as well as unobstructed visibility splays across the estate.

Parking Provision

The following tables provides a comparison between Medway Council's Interim Parking standard against the development parking proposal.

Table 1 – Riverside

RIVERSIDE				
Size of Units	**Number of Units**		**Development's Parking Provision**	**Medway's Interim Parking Standard**
1	62	110	74	62
2	48			72
3	21		21	42
4	20		32	40
Visitor Spaces			0	38
Total	**151**		**127**	**254**

Table 2 - Brunel

BRUNEL				
Size of units	**Number of Units**		**Development's Parking Provision**	**Medway's Interim Parking Standard**
1	26	57	53	26
2	31			47
3	28		28	56
4	23		41	46
Visitor Spaces			16	27
Total	**108**		**138**	**202**

In referencing Table 1 above, the parking provision for the Riverside Site represents 50% of the Council's minimum parking requirement. For the Brunel Site (Table 2), the percentage is greater at 68%.

Whilst recognising the site has reasonable accessibility to shops and other services, in practical terms the provision of 1 space for a 3 and 4 bedroom house is considered to be too low; these are family sized units and this should be reflected in the level of parking proposed. Similarly, the proposed ratio of 0.74 per unit for the 1 and 2 bedroom apartments is not an adequate provision.

It is recommended that the developer provides parking based on the following ratio:

- 2 spaces for a 4-bedroom dwellings;
- 1.5 spaces for the 3-bedroom dwelling;

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- 1 space for each 1 and 2 bedroom dwellings.

Notwithstanding the above, if the developer commits to providing 2 car clubs, in accordance with the following ratio 80 – 199 units 1 car, 200-399 units 2 cars, the Highway Authority would consider reducing the site's car parking provision. However, this would need to be one of the integral elements of the Final Travel Plan and secured via a S106 obligation.

The scheme would also need to accord with Paragraph 112e of the National Planning Policy Framework by providing electric vehicle charging points (EVC). It is recommended that each unit is provided with an EVC point. In addition to the above, each residential unit should have access to a secure and enclosed cycle storage facility. Each plot should be designed to accommodate the manoeuvres of a refuse vehicle as well as a fire tender. Medway's Waste Developer Guide 2019 provides reference to requirements for waste disposal.

S106 Contributions

Please refer to the guide to the developer contributions (Version 6 – Updated April 2023), which sets out Medway Council's policy relating to developer contributions.

As the application site is within 6km of the North Kent Marshes SPA/Ramsar Sites, the proposed development is likely to have a significant effect, either alone or in-combination, on the coastal North Kent Special Protection Areas (SPAs)/Ramsar sites from recreational disturbance on the over-wintering bird interest. Natural England has advised that an appropriate tariff of £314.05 per dwelling (excluding legal and monitoring officer's costs, which separately total £550) should be collected to fund strategic measures across the Thames, Medway and Swale Estuaries. This is also detailed within the developer contributions guide.

Information in support of an Application

Full application and drawings as per validation checklist which is available to view online (link below). Further information regarding the additional supporting information required is also detailed within the relevant sections above, in addition to those you have already identified on your Validation List.

PPA/Members presentation services – A PPA is a framework agreed between a local planning authority and a planning applicant/agent for the management of larger scale and complex development proposals within the planning process. A PPA allows both the developer and the local planning authority to agree a project plan and programme, which will include the appropriate resources necessary to determine the planning application to an agreed timetable.

It makes clear in advance what will be required of each party for the effective and efficient processing of the application. A PPA does not commit the LPA to a particular outcome but it is a commitment to a process and timetable for determining the application.

A fee for this scheme could be agreed nearer the time of submission. This will include the fees for:

- The Members presentation
- Pre-application charges you have already paid (which will be discounted)

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	• Planning officer time for the Section 106 Agreement (but not legal time) • A project plan, a minimum of 2 joint working meetings during the course of the application. Discussions are already ongoing with respect to a PPA for this site and details have been sent to Dave Harris for review.
	Consultation As part of a planning application, neighbouring properties and any relevant departments and statutory consultees would be consulted. You should also engage with other neighbouring stakeholders, including but not limited to Chatham Historic Dockyard Trust and Chatham Maritime, Local Councillors and neighbouring premises and businesses that may be affected.
Case Officer: [redacted]	**Date: 20th June 2023**

Other useful Links

Medway Local Plan 2003
https://www.medway.gov.uk/downloads/200133/planning

Chatham Interface Land Development Brief
https://www.medway.gov.uk/info/200149/planning_policy/607/chatham_interface_land_development

NPPF 2021
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

Validation Checklist
https://www.medway.gov.uk/downloads/file/1778/planning_permission_validation_checklist_2018

Nationally described space standards
https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

Medway Housing Design Standards
https://www.medway.gov.uk/downloads/file/61/medway_housing_design_standards

Mitigating Bird Disturbance
https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/5

Residential Parking Standards
https://www.medway.gov.uk/downloads/file/60/medway_council_residential_parking_standards

Parking Standards – Other Land Uses
https://www.medway.gov.uk/downloads/file/2329/parking_standards

Waste Management Requirements
https://www.medway.gov.uk/downloads/file/2740/waste_management_requirements_for_developers_2018

Guide to Developer Contributions
https://www.medway.gov.uk/downloads/file/2341/guide_to_developer_contributions_and_obligations

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APPENDIX
2

Technical Note 01
Project: Chatham Interface
Date: September 2024

Open Mosaic Habitat Review

1 Introduction

1.1.1 Aspect Ecology was commissioned by Vistry Kent in June 2024 to undertake an assessment of open mosaic habitat to inform proposed development of land at Chatham in Kent, immediately to the east of the River Medway close to the Historic Dockyard. The site comprises two land parcels referred to as the Brunel Parcel (Site A) and the Riverside Parcel (Site B) (see Plan 6872/TN1).

1.1.2 Based on a review of the Priority Habitat Inventory on the online Multi-Agency Geographic Information for the Countryside (MAGIC) database, both sites are identified as the Priority habitat type 'open mosaic habitat on previously developed land' (OMH). Aspect Ecology was commissioned to provide an assessment of whether this classification is appropriate, and provide a more detailed evaluation of the importance of the sites in regard to this habitat type.

1.1.3 The assessment is based on a review of desk study sources including the MAGIC database and historical aerial photography from Google Earth, and a habitat and botanical survey of the site undertaken in June and late July 2024.

1.1.4 This note provides an overview of the assessment and implications for development of the site.

2 Review of Desk Study Sources

2.1.1 The majority of land within both sites is included as OMH under the MAGIC Priority Habitat Inventory. The data records for both sites indicate the areas have been identified based on the dataset of previously developed land held by the NLUD and UK Perspectives Aerial Photography, rather than any ground truthing. Accordingly, the dataset assigns the reliability of priority habitat interpretation as low, stating *"probably the priority habitat but some uncertainty of interpretation"* and *"previously developed but no habitat data available".*

2.1.2 Historical aerial photography from Google Earth dating from 1960 shows the Brunel Parcel (Site A) as supporting several buildings and hardstanding areas, whilst Riverside Parcel (Site B) appears to be in use for storage of materials associated with the dockyard. By 1990, all buildings appear to have been demolished. There is some establishment of scrub/trees within the southern part of Brunel Parcel up to 2011, but these appear to have been cleared by 2013. The northern part of Brunel Parcel was also subject to use as a compound area in 2006/2007. The Riverside Parcel appears to have been subject to periodic disturbance in eastern and southern sections during the last c.20 years, maintaining bare/disturbed ground.

3 Habitats and Ecological Features

3.1 Overview

3.1.1 Both sites were subject to survey in June and late July 2024, focusing on open habitats (namely grassland and sparsely vegetated ground) in terms of classification as OMH. An overview of habitats within the two sites is set out below.

3.2 Grassland

Brunel Parcel (Site A)

3.2.1 Two main areas of grassland are present within the Brunel Parcel, identified as G1 and G3 on Plan 6872/TN1, together with two additional small areas (G2 and G4).

3.2.2 G1 forms the northern area and comprises relatively herb-rich, diverse grassland in association with areas of sparsely vegetated ground (see SV1 below). The area appears to be managed by occasional mowing, supporting a sward height up to 50cm in parts at the time of the June 2024 survey, with some small areas characterised by a low, open sward to around 5cm in height. The grassland and associated areas of sparsely vegetated ground support an average of 12.9 species per m^2 with frequent grasses including Cock's-foot, Perennial Rye-grass and Rough Meadow-grass and herbs including Black Medick, Common Bird's-foot Trefoil, Creeping Cinquefoil, Cut-leaved Crane's-bill, Dove's-foot Crane's-bill, Hawkweed Oxtongue, Red Clover, Spotted Medick and Yarrow.

3.2.3 G3 is similar in character, supporting a herb-rich, diverse grassland subject to occasional mowing. The area had been recently mown at the time of the late July 2024 survey, supporting a sward height of around 10cm. A central belt within the grassland supports a more open sward with small areas of sparsely vegetated ground (SV3), although otherwise the sward is dense and continuous. The grassland supports an average of 12.7 species per m^2 with frequent grasses including Cock's-foot and False Oat-grass and herbs including Common Bird's-foot Trefoil, Creeping Cinquefoil, Goat's-beard, Hawkweed Oxtongue, Meadow Vetchling, Red Clover, Ribwort Plantain, Wild Carrot and Yarrow.

3.2.4 G2 comprises a small area of less diverse grassland (supporting an average of 9 species per m^2), grading into sparsely vegetated ground on former hardstanding (SV2). The grassland supports a sward height of around 30cm with frequent species including Cock's-foot, Common Bird's-foot Trefoil, Creeping Bent, Creeping Cinquefoil, False Oat-grass, Ribwort Plantain and Yorkshire Fog. G4 comprises a narrow strip of grassland bordering the access road, dominated by rank grasses, ruderals and Bramble scrub.

3.2.5 Based on species composition and grassland character, grasslands G2 and G4 are characterised as 'other neutral grassland', a non-priority habitat type. Grassland G3 meets the necessary criteria for the priority habitat type 'lowland meadow' with three indicator species (Common Bird's-foot Trefoil, Goat's-beard and Meadow Vetchling) at least occasional within the grassland. This is a scarce and declining habitat type, albeit G3 does not appear to a high quality example of this habitat. Accordingly, G3 is considered to be of importance at the local level. Grassland G1 supports a similar richness of species, although slightly fewer lowland meadow indicators, such that this is best characterised as 'other neutral grassland'.

Riverside Parcel (Site B)

3.2.6 A large area of grassland forms much of western and northern part of the site, identified as G5 on Plan 6872/TN1. This appears to be maintained by regular mowing, maintaining a uniform sward approximately 5cm in height. The sward is continuous aside from a gravelled drainage strip and a slightly mounded area in the south which supports some small bare ground patches. The grassland supports an average of 8 species per m^2 with frequent grasses including Cock's-foot, Perennial Rye-grass and Red Fescue, and herbs including Black Medick, Hawkweed Oxtongue, Narrow-leaved Bird's-foot Trefoil, Red Clover and Yarrow. Based on species composition and grassland character, grassland G5 is characterised as 'other neutral grassland'.

3.3 Bare Ground, Sparsely Vegetated Land and Hardstanding

Brunel Parcel (Site A)

3.3.1 Small areas of sparsely vegetated land occur in association with G1, G2 and G3 (SV1, SV2 and SV3 respectively), with a further small area adjacent to the access road in the south (SV4) and a narrow strip of gravelled ground between the car parking area and western edge of G3 (SV6). SV5 forms a more extensive area in the east, bounded by a brick retaining wall at its eastern edge. All of the areas appear to be established on former hardstanding, gravelled areas or compacted ground, likely associated with the previous development and storage uses. Small rubble piles occur within SV1 and SV5.

3.3.2 Aside from small areas of more intact slabs of concrete or tarmac, areas are generally characterised by frequent vegetation, albeit this forms a sparse, open sward with bare substrate clearly visible between vegetation, in parts colonised by mosses. Typical species include Annual Fescue spp., Black Medick, Bristly Oxtongue, Canadian Fleabane, Creeping Cinquefoil, Hawkweed Oxtongue, Spotted Medick and Willowherb sp.

3.3.3 Areas of intact hardstanding with limited vegetation form an access road within the eastern part of the site and car parking areas to the west.

Riverside Parcel (Site B)

3.3.4 The eastern part of the site is dominated by a large area of sparsely vegetated ground, identified as SV7 on Plan 6872/TN1. The northern part is formed by large areas of concrete hardstanding, now beginning to degrade with vegetation establishing along cracks between slabs and within broken areas, together with some gravelled areas and smaller areas of more continuous grassland. Hardstanding is absent from the southern part, although this area appears to be subject to regular disturbance on likely thin soils, maintaining large areas of bare and recolonising ground. Two large rubble piles are present formed from broken up concrete slabs, located in the southern and northern parts of SV7.

3.3.5 The area therefore supports a mosaic of different vegetation types, ranging from largely unvegetated bare ground to recolonising ground to more continuous grassland and ruderal vegetation. Typical species include Annual Fescue spp., Black Medick, Bristly Oxtongue, Buck's-horn Plantain, Canadian Fleabane, Common Bent, Common Bird's-foot Trefoil, Fern Grass, Hare's-foot Clover, Hawkweed Oxtongue, Hop Trefoil, Narrow-leaved Bird's-foot Trefoil, Ribwort Plantain, Perennial Rye-grass, Red Clover, Sheep's-Fescue and Yarrow.

3.4 Other Habitats

Brunel Parcel (Site A)

3.4.1 The southern part of this parcel is dominated by other broadleaved woodland, characterised by frequent Sycamore. A clearing is present within the eastern area of woodland dominated by tall forbs including Rosebay Willowherb, Hogweed, Great Willowherb, Hemp Agrimony, Wild Teasel and False Oat-grass together with colonising Ash, Willow and Sycamore saplings. A water tank and storage container are also located within the area of G2/SV2. Several young to semi-mature trees are present at the boundaries of the site, together with scattered scrub along the western edge of G3.

Riverside Parcel (Site B)

3.4.2 An established band of mixed scrub occurs at the northern edge of this parcel, dominated by Hawthorn and young Ash. A small area of Bramble dominated area occurs at the south-eastern corner, whilst ornamental planting dominated by Cotoneaster and Ivy form hedgerows at the eastern edge adjacent to the road.

4 Assessment of Open Mosaic Habitat

4.1.1 Given the categorisation on the MAGIC database and the nature of habitats across much of the sites, supporting a mosaic of bare ground, sparse vegetation, grassland and scrub, consideration has been given to qualification under the priority habitat 'Open Mosaic Habitat on Previously Developed Land', based on the OMH definition set out under the former UK BAP[1].

4.1.2 The UK BAP priority habitat description sets out a number of criteria which must be met for an area to qualify as open mosaic habitat:

1) The area of open mosaic habitat is at least 0.25 ha in size.

2) Known history of disturbance at the site or evidence that soil has been removed or severely modified by previous use(s) of the site. Extraneous materials/ substrates such as industrial spoil may have been added.

3) The site contains some vegetation. This will comprise early successional communities consisting mainly of stress-tolerant species (e.g. indicative of low nutrient status or drought). Early successional communities are composed of (a) annuals, or (b) mosses/liverworts, or (c) lichens, or (d) ruderals, or (e) inundation species, or (f) open grassland, or (g) flower-rich grassland, or (h) heathland.

4) The site contains unvegetated, loose bare substrate and pools may be present.

5) The site shows spatial variation, forming a mosaic of one or more of the early successional communities (a)–(h) above (criterion 3) plus bare substrate, within 0.25 ha.

4.1.3 The majority of the area within both sites meets criteria 2, with former development or use for storage resulting in disturbance and/or modification to the substrate. Similarly, aside from some areas of more intact hardstanding, the sites support vegetation meeting criteria 3, with early successional community types including annuals, mosses/liverworts, ruderals, open grassland and flower-rich grassland. Unvegetated, loose bare substrate is present meeting

[1] BRIG (ed. Maddock, A.) 2008 (updated July 2010) *UK Biodiversity Action Plan: Priority Habitat Descriptions.*

criteria 4, whilst broadly the sites meet criteria 1 and 5, being at least 0.25ha in size and forming a mosaic of habitats.

4.1.4 However, it is appropriate to exclude areas of closed vegetation where these exceed 0.25ha in size, as these do not support a mosaic of open habitats and bare ground within a 0.25ha area (therefore failing criteria 5), or areas of vegetation below 0.25ha in size (failing criteria 1). Accordingly, the large areas of continuous grassland G3 and G5 (measuring approximately 0.6ha and 1.2ha) would not qualify as OMH, due to the lack of a mosaic within 0.25ha. Areas G2/SV2, G4, SV3, SV4, SV5 and SV6, which form distinct areas bounded by intact hardstanding or continuous grassland, are below the minimum size of 0.25ha under criteria 1, so would also not qualify as OMH.

4.1.5 Accordingly, area G1/SV1 within the Brunel Parcel (Site A) and area SV7 within the Riverside Parcel (Site B) are considered to qualify as the priority habitat type 'OMH on previously developed land'. G3 within the Brunel Parcel (Site A) also qualifies as the priority habitat type 'lowland meadow'.

4.1.6 In terms of the value of areas G1/SV1 and SV7 as OMH, this must consider the plant communities present, heterogeneity in terms of the habitat mosaic and topography, and value for other wildlife. In this regard, area G1/SV1 supports a relatively high species diversity with a mixture of different vegetation structures, including flower-rich grassland. Area SV7, whilst quite extensive, is more homogenous in terms of its character, with a large expanse of flat, open ground lacking topographical variation or a diverse habitat mosaic.

4.1.7 A number of species recorded are listed as Kent Axiophytes ('worthy' plants, indicators of habitat and considered important for conservation). However, only a single plant present has any elevated status, namely Common Cudweed which is Near Threatened and on the Kent Rare Plant Register (KRPR), albeit noted as still relatively frequent within the county. Accordingly, the areas of OMH are not considered to be of importance for notable plant species.

4.1.8 OMH typically forms an important habitat resource for invertebrates. In this regard, both G1/SV1 and SV7 support some microhabitat features offering potential for invertebrates including relatively species-rich vegetation, frequent patches of bare ground, a variable vegetation structure and flowering resource, although lack a variable topography, light soils for burrowing (areas of open ground being generally compacted) or other associated features such as frequent scattered scrub or wetland features which are typically found within higher quality areas of OMH. As such, whilst the areas may support some invertebrate interest, they are unlikely to be of high value.

4.1.9 On this basis, whilst both areas of OMH form important ecological features due to their priority habitat status, neither are considered to be of importance outside of a local context. Given the nature of the habitats present, it is considered that similar opportunities could be fairly readily recreated if the areas of OMH were to be lost, such that presence of OMH is not considered to be an overriding constraint to development.

5 Summary and Conclusions

5.1.1 An ecological assessment of Sites A and B (comprising the Brunel and Riverside Parcels) has been undertaken, with a focus on OMH to provide a detailed evaluation of the importance of the sites in regard to this habitat type.

5.1.2 The majority of land within both sites is included as OMH under the MAGIC Priority Habitat Inventory. However, based on a more detailed habitat survey, it is considered that only areas

G1/SV1 and SV7 meet the necessary criteria for this habitat type. Both of these areas of OMH form important ecological features due to their priority habitat status, although neither are considered to be of importance outside of a local context. Given the nature of the habitats present, it is considered that similar opportunities could be fairly readily recreated if the areas of OMH were to be lost, such that presence of OMH is not considered to be an overriding constraint to development.

5.1.3 Area G3 is characterised as 'lowland meadow' also forming a priority habitat type. This area is also considered to be of local importance. Lowland meadow is less readily recreated, such that this area should be retained as far as possible under any proposals.

5.1.4 Remaining habitats are not considered to form important ecological features, such that these appear relatively unconstrained in terms of ecology, albeit further surveys would be required in relation to faunal species (notably reptiles and invertebrates) at the appropriate stage to inform mitigation requirements.

Key:

Site Location

aspect ecology
APEM Group

Aspect Ecology Limited - West Court - Hardwick Business Park
Noral Way - Banbury - Oxfordshire - OX16 2AF
01295 279721 - info@aspect-ecology.com - www.aspect-ecology.com

Chatham Interface	PROJECT
Site Location and Habitat Areas	TITLE
6872/TN1	DRAWING NO.
A/DM	REV
September 2024	DATE
DM/JP	QC

Map data ©2024 Google. Aspect Ecology Ltd, West Court, Hardwick Business Park, Noral Way, Banbury, Oxfordshire, OX16 2AF.

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1.1.1 Aspect Ecology was commissioned by Vistry Kent in June 2024 to undertake an assessment of open mosaic habitat to inform proposed development of land at Chatham in Kent, immediately to the east of the River Medway close to the Historic Dockyard. The site comprises two land parcels referred to as the Brunel Parcel (Site A) and the Riverside Parcel (Site B) (see Plan 6872/TN1).

1.1.2 Based on a review of the Priority Habitat Inventory on the online Multi-Agency Geographic Information for the Countryside (MAGIC) database, both sites are identified as the Priority habitat type 'open mosaic habitat on previously developed land' (OMH). Aspect Ecology was commissioned to provide an assessment of whether this classification is appropriate, and provide a more detailed evaluation of the importance of the sites in regard to this habitat type.

1.1.3 The assessment is based on a review of desk study sources including the MAGIC database and historical aerial photography from Google Earth, and a habitat and botanical survey of the site undertaken in June and late July 2024.

1.1.4 This note provides an overview of the assessment and implications for development of the site.

2 Review of Desk Study Sources

2.1.1 The majority of land within both sites is included as OMH under the MAGIC Priority Habitat Inventory. The data records for both sites indicate the areas have been identified based on the dataset of previously developed land held by the NLUD and UK Perspectives Aerial Photography, rather than any ground truthing. Accordingly, the dataset assigns the reliability of priority habitat interpretation as low, stating *"probably the priority habitat but some uncertainty of interpretation"* and *"previously developed but no habitat data available".*

2.1.2 Historical aerial photography from Google Earth dating from 1960 shows the Brunel Parcel (Site A) as supporting several buildings and hardstanding areas, whilst Riverside Parcel (Site B) appears to be in use for storage of materials associated with the dockyard. By 1990, all buildings appear to have been demolished. There is some establishment of scrub/trees within the southern part of Brunel Parcel up to 2011, but these appear to have been cleared by 2013. The northern part of Brunel Parcel was also subject to use as a compound area in 2006/2007. The Riverside Parcel appears to have been subject to periodic disturbance in eastern and southern sections during the last c.20 years, maintaining bare/disturbed ground.

3 Habitats and Ecological Features

3.1 Overview

3.1.1 Both sites were subject to survey in June and late July 2024, focusing on open habitats (namely grassland and sparsely vegetated ground) in terms of classification as OMH. An overview of habitats within the two sites is set out below.

3.2 Grassland

Brunel Parcel (Site A)

3.2.1 Two main areas of grassland are present within the Brunel Parcel, identified as G1 and G3 on Plan 6872/TN1, together with two additional small areas (G2 and G4).

3.2.2 G1 forms the northern area and comprises relatively herb-rich, diverse grassland in association with areas of sparsely vegetated ground (see SV1 below). The area appears to be managed by occasional mowing, supporting a sward height up to 50cm in parts at the time of the June 2024 survey, with some small areas characterised by a low, open sward to around 5cm in height. The grassland and associated areas of sparsely vegetated ground support an average of 12.9 species per m^2 with frequent grasses including Cock's-foot, Perennial Rye-grass and Rough Meadow-grass and herbs including Black Medick, Common Bird's-foot Trefoil, Creeping Cinquefoil, Cut-leaved Crane's-bill, Dove's-foot Crane's-bill, Hawkweed Oxtongue, Red Clover, Spotted Medick and Yarrow.

3.2.3 G3 is similar in character, supporting a herb-rich, diverse grassland subject to occasional mowing. The area had been recently mown at the time of the late July 2024 survey, supporting a sward height of around 10cm. A central belt within the grassland supports a more open sward with small areas of sparsely vegetated ground (SV3), although otherwise the sward is dense and continuous. The grassland supports an average of 12.7 species per m^2 with frequent grasses including Cock's-foot and False Oat-grass and herbs including Common Bird's-foot Trefoil, Creeping Cinquefoil, Goat's-beard, Hawkweed Oxtongue, Meadow Vetchling, Red Clover, Ribwort Plantain, Wild Carrot and Yarrow.

3.2.4 G2 comprises a small area of less diverse grassland (supporting an average of 9 species per m^2), grading into sparsely vegetated ground on former hardstanding (SV2). The grassland supports a sward height of around 30cm with frequent species including Cock's-foot, Common Bird's-foot Trefoil, Creeping Bent, Creeping Cinquefoil, False Oat-grass, Ribwort Plantain and Yorkshire Fog. G4 comprises a narrow strip of grassland bordering the access road, dominated by rank grasses, ruderals and Bramble scrub.

3.2.5 Based on species composition and grassland character, grasslands G2 and G4 are characterised as 'other neutral grassland', a non-priority habitat type. Grassland G3 meets the necessary criteria for the priority habitat type 'lowland meadow' with three indicator species (Common Bird's-foot Trefoil, Goat's-beard and Meadow Vetchling) at least occasional within the grassland. This is a scarce and declining habitat type, albeit G3 does not appear to a high quality example of this habitat. Accordingly, G3 is considered to be of importance at the local level. Grassland G1 supports a similar richness of species, although slightly fewer lowland meadow indicators, such that this is best characterised as 'other neutral grassland'.

Riverside Parcel (Site B)

3.2.6 A large area of grassland forms much of western and northern part of the site, identified as G5 on Plan 6872/TN1. This appears to be maintained by regular mowing, maintaining a uniform sward approximately 5cm in height. The sward is continuous aside from a gravelled drainage strip and a slightly mounded area in the south which supports some small bare ground patches. The grassland supports an average of 8 species per m^2 with frequent grasses including Cock's-foot, Perennial Rye-grass and Red Fescue, and herbs including Black Medick, Hawkweed Oxtongue, Narrow-leaved Bird's-foot Trefoil, Red Clover and Yarrow. Based on species composition and grassland character, grassland G5 is characterised as 'other neutral grassland'.

3.3 Bare Ground, Sparsely Vegetated Land and Hardstanding

Brunel Parcel (Site A)

3.3.1 Small areas of sparsely vegetated land occur in association with G1, G2 and G3 (SV1, SV2 and SV3 respectively), with a further small area adjacent to the access road in the south (SV4) and a narrow strip of gravelled ground between the car parking area and western edge of G3 (SV6). SV5 forms a more extensive area in the east, bounded by a brick retaining wall at its eastern edge. All of the areas appear to be established on former hardstanding, gravelled areas or compacted ground, likely associated with the previous development and storage uses. Small rubble piles occur within SV1 and SV5.

3.3.2 Aside from small areas of more intact slabs of concrete or tarmac, areas are generally characterised by frequent vegetation, albeit this forms a sparse, open sward with bare substrate clearly visible between vegetation, in parts colonised by mosses. Typical species include Annual Fescue spp., Black Medick, Bristly Oxtongue, Canadian Fleabane, Creeping Cinquefoil, Hawkweed Oxtongue, Spotted Medick and Willowherb sp.

3.3.3 Areas of intact hardstanding with limited vegetation form an access road within the eastern part of the site and car parking areas to the west.

Riverside Parcel (Site B)

3.3.4 The eastern part of the site is dominated by a large area of sparsely vegetated ground, identified as SV7 on Plan 6872/TN1. The northern part is formed by large areas of concrete hardstanding, now beginning to degrade with vegetation establishing along cracks between slabs and within broken areas, together with some gravelled areas and smaller areas of more continuous grassland. Hardstanding is absent from the southern part, although this area appears to be subject to regular disturbance on likely thin soils, maintaining large areas of bare and recolonising ground. Two large rubble piles are present formed from broken up concrete slabs, located in the southern and northern parts of SV7.

3.3.5 The area therefore supports a mosaic of different vegetation types, ranging from largely unvegetated bare ground to recolonising ground to more continuous grassland and ruderal vegetation. Typical species include Annual Fescue spp., Black Medick, Bristly Oxtongue, Buck's-horn Plantain, Canadian Fleabane, Common Bent, Common Bird's-foot Trefoil, Fern Grass, Hare's-foot Clover, Hawkweed Oxtongue, Hop Trefoil, Narrow-leaved Bird's-foot Trefoil, Ribwort Plantain, Perennial Rye-grass, Red Clover, Sheep's-Fescue and Yarrow.

3.4 Other Habitats

Brunel Parcel (Site A)

3.4.1 The southern part of this parcel is dominated by other broadleaved woodland, characterised by frequent Sycamore. A clearing is present within the eastern area of woodland dominated by tall forbs including Rosebay Willowherb, Hogweed, Great Willowherb, Hemp Agrimony, Wild Teasel and False Oat-grass together with colonising Ash, Willow and Sycamore saplings. A water tank and storage container are also located within the area of G2/SV2. Several young to semi-mature trees are present at the boundaries of the site, together with scattered scrub along the western edge of G3.

Riverside Parcel (Site B)

3.4.2 An established band of mixed scrub occurs at the northern edge of this parcel, dominated by Hawthorn and young Ash. A small area of Bramble dominated area occurs at the south-eastern corner, whilst ornamental planting dominated by Cotoneaster and Ivy form hedgerows at the eastern edge adjacent to the road.

4 Assessment of Open Mosaic Habitat

4.1.1 Given the categorisation on the MAGIC database and the nature of habitats across much of the sites, supporting a mosaic of bare ground, sparse vegetation, grassland and scrub, consideration has been given to qualification under the priority habitat 'Open Mosaic Habitat on Previously Developed Land', based on the OMH definition set out under the former UK BAP[1].

4.1.2 The UK BAP priority habitat description sets out a number of criteria which must be met for an area to qualify as open mosaic habitat:

1) The area of open mosaic habitat is at least 0.25 ha in size.

2) Known history of disturbance at the site or evidence that soil has been removed or severely modified by previous use(s) of the site. Extraneous materials/ substrates such as industrial spoil may have been added.

3) The site contains some vegetation. This will comprise early successional communities consisting mainly of stress-tolerant species (e.g. indicative of low nutrient status or drought). Early successional communities are composed of (a) annuals, or (b) mosses/liverworts, or (c) lichens, or (d) ruderals, or (e) inundation species, or (f) open grassland, or (g) flower-rich grassland, or (h) heathland.

4) The site contains unvegetated, loose bare substrate and pools may be present.

5) The site shows spatial variation, forming a mosaic of one or more of the early successional communities (a)–(h) above (criterion 3) plus bare substrate, within 0.25 ha.

4.1.3 The majority of the area within both sites meets criteria 2, with former development or use for storage resulting in disturbance and/or modification to the substrate. Similarly, aside from some areas of more intact hardstanding, the sites support vegetation meeting criteria 3, with early successional community types including annuals, mosses/liverworts, ruderals, open grassland and flower-rich grassland. Unvegetated, loose bare substrate is present meeting

[1] BRIG (ed. Maddock, A.) 2008 (updated July 2010) *UK Biodiversity Action Plan: Priority Habitat Descriptions.*

criteria 4, whilst broadly the sites meet criteria 1 and 5, being at least 0.25ha in size and forming a mosaic of habitats.

4.1.4 However, it is appropriate to exclude areas of closed vegetation where these exceed 0.25ha in size, as these do not support a mosaic of open habitats and bare ground within a 0.25ha area (therefore failing criteria 5), or areas of vegetation below 0.25ha in size (failing criteria 1). Accordingly, the large areas of continuous grassland G3 and G5 (measuring approximately 0.6ha and 1.2ha) would not qualify as OMH, due to the lack of a mosaic within 0.25ha. Areas G2/SV2, G4, SV3, SV4, SV5 and SV6, which form distinct areas bounded by intact hardstanding or continuous grassland, are below the minimum size of 0.25ha under criteria 1, so would also not qualify as OMH.

4.1.5 Accordingly, area G1/SV1 within the Brunel Parcel (Site A) and area SV7 within the Riverside Parcel (Site B) are considered to qualify as the priority habitat type 'OMH on previously developed land'. G3 within the Brunel Parcel (Site A) also qualifies as the priority habitat type 'lowland meadow'.

4.1.6 In terms of the value of areas G1/SV1 and SV7 as OMH, this must consider the plant communities present, heterogeneity in terms of the habitat mosaic and topography, and value for other wildlife. In this regard, area G1/SV1 supports a relatively high species diversity with a mixture of different vegetation structures, including flower-rich grassland. Area SV7, whilst quite extensive, is more homogenous in terms of its character, with a large expanse of flat, open ground lacking topographical variation or a diverse habitat mosaic.

4.1.7 A number of species recorded are listed as Kent Axiophytes ('worthy' plants, indicators of habitat and considered important for conservation). However, only a single plant present has any elevated status, namely Common Cudweed which is Near Threatened and on the Kent Rare Plant Register (KRPR), albeit noted as still relatively frequent within the county. Accordingly, the areas of OMH are not considered to be of importance for notable plant species.

4.1.8 OMH typically forms an important habitat resource for invertebrates. In this regard, both G1/SV1 and SV7 support some microhabitat features offering potential for invertebrates including relatively species-rich vegetation, frequent patches of bare ground, a variable vegetation structure and flowering resource, although lack a variable topography, light soils for burrowing (areas of open ground being generally compacted) or other associated features such as frequent scattered scrub or wetland features which are typically found within higher quality areas of OMH. As such, whilst the areas may support some invertebrate interest, they are unlikely to be of high value.

4.1.9 On this basis, whilst both areas of OMH form important ecological features due to their priority habitat status, neither are considered to be of importance outside of a local context. Given the nature of the habitats present, it is considered that similar opportunities could be fairly readily recreated if the areas of OMH were to be lost, such that presence of OMH is not considered to be an overriding constraint to development.

5 Summary and Conclusions

5.1.1 An ecological assessment of Sites A and B (comprising the Brunel and Riverside Parcels) has been undertaken, with a focus on OMH to provide a detailed evaluation of the importance of the sites in regard to this habitat type.

5.1.2 The majority of land within both sites is included as OMH under the MAGIC Priority Habitat Inventory. However, based on a more detailed habitat survey, it is considered that only areas

G1/SV1 and SV7 meet the necessary criteria for this habitat type. Both of these areas of OMH form important ecological features due to their priority habitat status, although neither are considered to be of importance outside of a local context. Given the nature of the habitats present, it is considered that similar opportunities could be fairly readily recreated if the areas of OMH were to be lost, such that presence of OMH is not considered to be an overriding constraint to development.

5.1.3 Area G3 is characterised as 'lowland meadow' also forming a priority habitat type. This area is also considered to be of local importance. Lowland meadow is less readily recreated, such that this area should be retained as far as possible under any proposals.

5.1.4 Remaining habitats are not considered to form important ecological features, such that these appear relatively unconstrained in terms of ecology, albeit further surveys would be required in relation to faunal species (notably reptiles and invertebrates) at the appropriate stage to inform mitigation requirements.

Key:

Site Location

aspect ecology
APEM Group

Aspect Ecology Limited - West Court - Hardwick Business Park
Noral Way - Banbury - Oxfordshire - OX16 2AF
01295 279721 - info@aspect-ecology.com - www.aspect-ecology.com

Chatham Interface	PROJECT
Site Location and Habitat Areas	TITLE
6872/TN1	DRAWING NO.
A/DM	REV
September 2024	DATE
DM/JP	QC

Map data ©2024 Google. Aspect Ecology Ltd, West Court, Hardwick Business Park, Noral Way, Banbury, Oxfordshire, OX16 2AF.

Pre-Application Advice Response

	Site Address: Chatham Interface Land, Historic Dockyard, Chatham, ME4 4TE	**Ref No:** PRE/23/0587
	Our description of your proposal: Construction of up to 259 dwellings spread across flat and house typologies, in buildings up to five storeys, including potential ground floor commercial space, landscape and river frontage improvements with associated parking.	
	Main Considerations **<u>Principle</u>** The Riverside and Brunel site is located within the wider Chatham Maritime Regeneration Area as defined by the Medway Local Plan (2003) and are therefore deemed suitable in principle for development. The adopted Chatham Interface Land Development Brief (June 2018) also supports the development of this key regeneration site and in doing so identifies the potential for a residential-led development with opportunities for supporting mixed uses. Relevant adopted policies relating to Chatham Maritime are shown below. **Chatham Maritime Policy S8: Chatham Maritime Mixed Use Zone** Development will: Include a factory outlet centre (retail), Class B1 offices, a hotel, land and water-based leisure uses and housing. Tourist facilities and Class A3 uses of a scale commensurate with their location will also be appropriate. Create a new transportation framework for the sites, including improved public transport, cycling and pedestrian links to Chatham and Gillingham town centres with a key objective of reducing the need to travel by the private car. Promote high quality and innovative design approaches to create a high quality and vibrant environment. Promote development which is complementary to the Chatham Historic Dockyard in order to maximise visitor appeal and integrate the site with the wider environment. **Chatham Maritime Policy S9: Chatham Historic Dockyard** 'At the Historic Dockyard development that respects the historic character of the site will be permitted. The standard of urban design must be of the highest order'. **Education Policy CF7: Further, Higher and Adult Education** 'Expansion of the existing campuses at Chatham Maritime and Chatham Historic Dockyard will be permitted' **<u>Summary of Heritage Policies in Medway Local Plan</u>** **BNE12 – Conservation Areas** Special attention will be paid to the preservation and enhancement of the character and appearance of Conservation Areas.	

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BNE14 – Development in Conservation Areas
Development within Conservation Areas, or affecting their setting, should achieve a high quality of design which will preserve or enhance the area's historic or architectural character or appearance. Criteria relating to built form, layout, building materials and appearance, streetscape and hard and soft landscaping are set out in the full policy.

BNE18 – Setting of Listed Buildings
Development which would adversely affect the setting of a listed building will not be permitted.

BNE 20 – Scheduled Ancient Monuments
Development affecting Scheduled Ancient Monuments or other nationally important sites will not be permitted if it would damage or destroy such sites, or be detrimental to their setting

BNE 21 – Archaeological Sites
Development affecting potentially important archaeological sites will not be permitted, unless:
• The developer, after consultation with the archaeological officer, has arranged for an archaeological field evaluation to be carried out by an approved archaeological body before any decision on the planning application is made;
• It would not lead to the damage or destruction of important archaeological remains. There will be a preference for the preservation of important archaeological remains in situ;
• Where development would be damaging to archaeological remains, sufficient time and resources are made available for an appropriate archaeological investigation undertaken by an approved archaeological body. Such investigations should be in advance of development and in accordance with a specification and programme of work approved by the council. Resources should also be made available for the publication of the results of the investigation.

Design and Landscape

These important and prominent sites have the potential to create a new benchmark for future place-making and residential led mixed use development, providing a key part in the success of Medway's future growth. In response to the pre-application document submitted the following points were raised during initial discussions regarding the proposal.

The Brunel site has an important relationship with the Police Section House (Section House), and therefore this heritage asset needs to stand alone, the apartment blocks shown on the indicative plans should therefore be subservient to the Section House. This could manifest by reducing the height of the apartment blocks by a storey or perhaps changing the typology, albeit it is understood the decision to proceed with flats is linked to viability. The relationship between the apartment blocks and Section House will be discussed in more detail as the design evolves.

The repetitive nature and roof lines of the proposed buildings picks up on the rhythm of the previous structures on site, and whilst the overall built form and layout is a good starting point the mast pond does present some challenges with respect to the geometries of the layout (Brunel Site) and the appreciation of the Section House. The mast pond is at an angle to the main route through the Brunel Site, and as such opportunities to better reveal the significance, and connection between the mast

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pond and Section House should be explored. At present this route feels a little narrow, and there is a placemaking opportunity to better frame the Section House in this context.

As discussed during the meeting, and in respect to the Riverside site, there are different ways of approaching the relationship with the covered slips. One option would be to continue the tradition of technological innovation and iconic built form to produce a distinctive tower block. However, it is noted from the indicative proposal presented that this approach has not been taken and instead the massing is more conservative to give prominence to the slips. The lower rise typologies on the Riverside site is an equally valid approach and in turn would address previous concerns raised from Historic England that a larger and taller form of development could compete with the covered slips. However, the architectural language and materiality of the buildings would need to be carefully considered and we would expect a significant quality in the materiality and architectural language. There is also an abundance of features to this site that the architecture needs to develop a unique response and identity too, and one that is different to that found at other riverside development sites in Medway.
Whilst there is commercial space that fronts the mast pond (Riverside Site), this could be extended around the side and rear of the apartment block (most northern block) to the riverside frontage to provide a more engaging and active connection to the river, making this area feel more public.

The materiality and landscaping within the Riverside Site, and particularly around the slipway, also needs to be thought through and discussed in more detail, so agreement can be reached on the correct approach for this area. Particularly when considering the historical use of the slipway, and the intended function for this public area.

There is also an interesting relationship at the northern edge of the Brunel plot. The Travelodge building is of a larger scale to the proposed houses. The concern being the proximity and differing relative scale between the existing prominent medium rise hotel building and proposed low rise residential dwellings. This area also transitions into a car park, though is illustrated in (3.3 Aerial View) the character of a wide civic promenade, and how the pedestrian link crossing this site is dealt with would also need to be thought about. The line of existing mature avenue trees following the eastern site boundary provide a potentially valuable placemaking feature and also the means of establishing the residential edge landscape character.

A views analysis is also important and should drive the scheme. All the viewpoints should be considered, including key townscape views and vantage points and these can be discussed and agreed with relevant officers. Initial thoughts have been provided by the Senior Landscape Officer below;

Looking out from Police house northeast and in reverse.

- Tower Hill – Long distance view which engages the wider landscape context and wooded character of Tower Hill, currently and historically occupying the horizon in this view.
    - Out - Consider maintaining the distant wooded horizon above building ridgelines, in this view where possible. This wider landscape character has historic value for the setting of Riverside Site buildings, when viewed from the Section House. Also, a green element above ridgelines, can contribute to a reduced prominence of hardscape within the site, which will prevail generally in the current residential proposals.

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        - Reverse – In addition to Upnor Castle, views towards the Section House may be possible from higher publicly accessible areas of Tower Hill, residential areas of Upnor and also the England Coast Path/Saxon Shore Way.
    - South Pondside Road and Land Adjacent to the Covered Slips – Medium distance view which in the current layout potentially provides one of two unbroken vistas towards the waterfront edge.
    - Section House Frontage – Short distance view which in the current layout is towards a proposed street and over a proposed public space opposite the main building frontage.
        - Consider the location of both end terraces proposed along the new street, particularly regarding their potential for composing the Section House in the vista which would be seen from the proposed public space.
- Looking out from Mast Pond southeast edge.
    - Tower Hill – Long distance view which engages the wider landscape context and wooded character of Tower Hill, currently and historically occupying the horizon in this view.
        - Consider maintaining the distant wooded horizon above the building ridgelines, in this view aligned with the access road and between the proposed residential blocks.
- Looking from elevated footpath north of site towards the proposed development.
    - Footpath approach – Medium distance view through break in structure planting trees.
        - Consider this view from a northern site approach. A potential vista is available due to alignments of the access road separating the proposed residential blocks. The viewpoint location is elevated and offers wayfinding value because of the additional context potentially viewed over Chatham Intra.

Heritage

As discussed during the initial pre-app meeting there are two main heritage considerations;

- The buried archaeology and the potential for this to be of national significance; and
- How the development interacts with the setting of the listed buildings and scheduled monuments.

The design, layout and massing should also take account of the character of the Conservation Area and should achieve a high quality of design which will preserve or enhance the area's historic or architectural character or appearance. This will be largely dictated by the number of Listed Buildings, Scheduled Monuments and the presence of archaeology. Consideration also needs to be given to how the proposed development will alter the general historic industrial-military character of the area and sense of arrival to the Dockyard.

Notwithstanding the points raised above in relation to the flatted blocks and the setting of the Police Section House, more detailed comments with respect to Heritage will be provided by Historic England under a separate cover.

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Archaeology

The NPPF recognises that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance (paragraph 189). The NPPF sets out a significance-led approach to decision taking and describes (paragraph 194) how applicants should describe the significance of any heritage assets affected and that the level of assessment required should be proportionate to the asset's importance.

For heritage assets of archaeological interest, the NPPF requires that developers submit an appropriate desk-based assessment and, where necessary a field evaluation. Because the site has the potential to contain important archaeological remains it is likely that a field evaluation will be required to be submitted as part of any planning application.

The possibility that nationally important archaeology might be present within the application site cannot yet be ruled out. Footnote 68 of the NPPF explains that:

'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'.

In essence, the presumption is that nationally significant archaeological remains should be preserved in situ. Therefore, understanding whether such remains are present – or not – is essential to understanding how development might be accommodated at the site.

It is recognised that in many instances archaeological remains are not of a level of significance whereby Footnote 68 of the NPPF would apply. In such circumstances the NPPF requires (paragraph 203) that decision takers take account the effect of a development on significance and that a balanced judgement will be required.

The ability to record archaeology by excavation should not be a factor in deciding whether or not its loss should be accepted, but if it is so agreed then it is essential that the implications of archaeological investigation (both in terms of cost and programme) are understood and planned for.

The need to deliver an appropriate design response that balances above and below ground heritage issues, alongside other aspects such as townscape and biodiversity is fully acknowledged. As discussed, the northern end of this southern block (Riverside Site) may pose a problem as it is in an area where KCC know there is good presentation of 18th century waterfront archaeology.

Ecology

The most notable ecological features within the site would be the semi-improved grassland, scattered trees, scrub and woodland located along the boundary with Dock Road. The riverside site also contains a large area of improved grassland where there have been previous records of foraging, nesting and overwintering birds. Appropriate ecological surveys will therefore be required and proposals should respond to the results of any survey work and show an appropriate design response to support and enhance on-site ecology. One of the principles of the NPPF is that opportunities to incorporate

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biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity. Consequently, the proposal should also incorporate ecological enhancement opportunities, tree lined streets and demonstrate that biodiversity net gain (BNG) can be achieved through a BNG Feasibility assessment.

Noise, Air Quality and Contamination

The sites are near busy roads and a variety of commercial/industrial type uses and therefore exposure to high noise levels is likely. There may also be noise contributions from use of the river Medway and from Medway City Estate. A noise impact assessment will therefore be required with any application. The scope and methodology used should be agreed with the Environmental Protection (EP) team up front (env.planning@medway.gov.uk). Any proposed commercial uses will also need to be considered, and depending on the nature of these uses they may also need to be included in the noise assessment. Being near busy roads also introduces potential air quality issues for new sensitive receptors as well as impacts on existing levels of air pollution. Therefore, an air quality assessment will also need to be submitted with the application. Again, the scope and methodology used should be agreed with the EP team up front.

Given the historic former uses of the sites a phase 1 contamination desk top study should be submitted with any application.

Affordable Housing

Medway's adopted local plan sets out a requirement for 25% affordable housing, with 60% affordable rent and 40% for intermediate (affordable homeownership of which shared ownership is the preferred option). Where sites are being considered under these policies, a minimum of 25% of affordable homes should be First Homes. 5% of the Affordable Housing should be delivered as wheelchair user dwellings as per part M4 (3) of the Building Regulations.

The affordable units should be physically indistinguishable from the equivalent market homes. Currently, First Homes delivered in Medway are subject to the National Criteria: 30% discount against the market value and a price cap of £250,000 (after the discount is applied). More information regarding First Homes is available from the Councils website;

https://www.medway.gov.uk/firsthomes

In terms of housing need the higher demand is for family sized housing (2 bed +) as opposed to 1 bed units.

Highways

Both sites have reasonable accessibility having regard to the general distance to retail, commercial amenities facilities to the north and some bus services, and Chatham Station located circa 2.3km to the south.

The Riverside Site is bounded by Leviathan Way to the north, Main Gate Road to the east, the River Medway to the west and the covered sips to the south. The site benefits from a single vehicular access

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off Main Gate Road, which is retained to serve the 151 residential units comprising 62 x 1 beds, 48 x 2 beds, 21 x 3 beds and 20 x 4 beds (based on the applicant's submission document).

The Brunel Site which is subdivided into two plots is situated to the west of Dock Road and east of East Road/ car park. Both plots will have access to Brunel Way. The site will accommodate 108 residential units comprising 26 x 1 beds, 31 x 2 beds, 28 x 3 beds and 23 x 4 beds (based on the applicant's submission document).

Transport Assessment

Given the size of the development, any future application should be accompanied by a Transport Assessment (TA), which describes the existing transport conditions in the vicinity of the sites, including the opportunities for walking, cycling and public transport use, as well as an overview of the local highway network - a review of walking and cycling routes (i.e. a non-motorised user (NMU) audit) to key local services and facilities, as well as an audit of the existing public transport service and infrastructure.

The TA should provide a traffic impact analysis of the proposed development on the local highway network, and where appropriate include mitigation measures which could be secured via a S106 contribution/S38/S278 Agreement (Highways Act 1980). Below is the list of the elements that should be covered:

- Traffic flows;
- Traffic Growth;
- Committed Developments;
- Traffic Generation;
- Trip Distribution and Assignment;
- Junction Operational Assessment.

In addition to the above, it is recommended that the junctions capacity test is carried out on the following:

- Pembroke Road/Dock Road Roundabout;
- Brunel Way/Dock Road;
- Main Gate Road/Western Avenue;
- Dock Road/A231 Roundabout;
- Maritime Way Roundabout; and
- A231 Brompton Road/B2004 Prince Arthur Road.

Sustainable Transport Strategy

In accordance with Paragraph 110 of the NPPF, the applicant should consider how opportunities for sustainable travel will be taken up, i.e., the provision of local off-site improvements to walking and cycle infrastructure on local desire lines; the provision of new or improved bus stops; framework Travel Plan; and Car club. Improving pedestrian and cycle connectivity with the rest of Chatham Maritime via the riverside path, and along Brunel Way to the universities, Lower Lines Park, Gillingham, will also need to be considered.

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On Site Pedestrian Access

Pedestrian permeability across the development should be a key feature in the design, with the provision of minimum footway widths of 1.80m (preferably 2.0m), and a maximum speed limit of 20mph through the estate and enforced by traffic calming measures, as well as unobstructed visibility splays across the estate.

Parking Provision

The following tables provides a comparison between Medway Council's Interim Parking standard against the development parking proposal.

Table 1 – Riverside

RIVERSIDE				
Size of Units	**Number of Units**		**Development's Parking Provision**	**Medway's Interim Parking Standard**
1	62	110	74	62
2	48			72
3	21		21	42
4	20		32	40
Visitor Spaces			0	38
Total	**151**		**127**	**254**

Table 2 - Brunel

BRUNEL				
Size of units	**Number of Units**		**Development's Parking Provision**	**Medway's Interim Parking Standard**
1	26	57	53	26
2	31			47
3	28		28	56
4	23		41	46
Visitor Spaces			16	27
Total	**108**		**138**	**202**

In referencing Table 1 above, the parking provision for the Riverside Site represents 50% of the Council's minimum parking requirement. For the Brunel Site (Table 2), the percentage is greater at 68%.

Whilst recognising the site has reasonable accessibility to shops and other services, in practical terms the provision of 1 space for a 3 and 4 bedroom house is considered to be too low; these are family sized units and this should be reflected in the level of parking proposed. Similarly, the proposed ratio of 0.74 per unit for the 1 and 2 bedroom apartments is not an adequate provision.

It is recommended that the developer provides parking based on the following ratio:

- 2 spaces for a 4-bedroom dwellings;
- 1.5 spaces for the 3-bedroom dwelling;

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- 1 space for each 1 and 2 bedroom dwellings.

Notwithstanding the above, if the developer commits to providing 2 car clubs, in accordance with the following ratio 80 – 199 units 1 car, 200-399 units 2 cars, the Highway Authority would consider reducing the site's car parking provision. However, this would need to be one of the integral elements of the Final Travel Plan and secured via a S106 obligation.

The scheme would also need to accord with Paragraph 112e of the National Planning Policy Framework by providing electric vehicle charging points (EVC). It is recommended that each unit is provided with an EVC point. In addition to the above, each residential unit should have access to a secure and enclosed cycle storage facility. Each plot should be designed to accommodate the manoeuvres of a refuse vehicle as well as a fire tender. Medway's Waste Developer Guide 2019 provides reference to requirements for waste disposal.

S106 Contributions

Please refer to the guide to the developer contributions (Version 6 – Updated April 2023), which sets out Medway Council's policy relating to developer contributions.

As the application site is within 6km of the North Kent Marshes SPA/Ramsar Sites, the proposed development is likely to have a significant effect, either alone or in-combination, on the coastal North Kent Special Protection Areas (SPAs)/Ramsar sites from recreational disturbance on the over-wintering bird interest. Natural England has advised that an appropriate tariff of £314.05 per dwelling (excluding legal and monitoring officer's costs, which separately total £550) should be collected to fund strategic measures across the Thames, Medway and Swale Estuaries. This is also detailed within the developer contributions guide.

Information in support of an Application

Full application and drawings as per validation checklist which is available to view online (link below). Further information regarding the additional supporting information required is also detailed within the relevant sections above, in addition to those you have already identified on your Validation List.

PPA/Members presentation services – A PPA is a framework agreed between a local planning authority and a planning applicant/agent for the management of larger scale and complex development proposals within the planning process. A PPA allows both the developer and the local planning authority to agree a project plan and programme, which will include the appropriate resources necessary to determine the planning application to an agreed timetable.

It makes clear in advance what will be required of each party for the effective and efficient processing of the application. A PPA does not commit the LPA to a particular outcome but it is a commitment to a process and timetable for determining the application.

A fee for this scheme could be agreed nearer the time of submission. This will include the fees for:

- The Members presentation
- Pre-application charges you have already paid (which will be discounted)

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	• Planning officer time for the Section 106 Agreement (but not legal time) • A project plan, a minimum of 2 joint working meetings during the course of the application. Discussions are already ongoing with respect to a PPA for this site and details have been sent to Dave Harris for review.
	Consultation As part of a planning application, neighbouring properties and any relevant departments and statutory consultees would be consulted. You should also engage with other neighbouring stakeholders, including but not limited to Chatham Historic Dockyard Trust and Chatham Maritime, Local Councillors and neighbouring premises and businesses that may be affected.
Case Officer: [redacted]	**Date: 20th June 2023**

Other useful Links

Medway Local Plan 2003
https://www.medway.gov.uk/downloads/200133/planning

Chatham Interface Land Development Brief
https://www.medway.gov.uk/info/200149/planning_policy/607/chatham_interface_land_development

NPPF 2021
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

Validation Checklist
https://www.medway.gov.uk/downloads/file/1778/planning_permission_validation_checklist_2018

Nationally described space standards
https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

Medway Housing Design Standards
https://www.medway.gov.uk/downloads/file/61/medway_housing_design_standards

Mitigating Bird Disturbance
https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/5

Residential Parking Standards
https://www.medway.gov.uk/downloads/file/60/medway_council_residential_parking_standards

Parking Standards – Other Land Uses
https://www.medway.gov.uk/downloads/file/2329/parking_standards

Waste Management Requirements
https://www.medway.gov.uk/downloads/file/2740/waste_management_requirements_for_developers_2018

Guide to Developer Contributions
https://www.medway.gov.uk/downloads/file/2341/guide_to_developer_contributions_and_obligations

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planning
transport
design
environment
infrastructure
land

Medway Council Regulation 18 Consultation Response

Brompton Farm, Strood

LAA REF: SNF3
OPUS SUBMISSION FORM REF: 292
RESPONDENT ID REF: 365
REGULATION 18a SUBMISSION ID:1690
REGULATION 18b SUBMISSION ID:2899

CLIENT: BELLWAY HOMES LTD

SEPTEMBER 2024
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CONTENTS

1 INTRODUCTION 4
1.1 PURPOSE OF THE STATEMENT 4
Overview 4
Plan Context 4
Draft NPPF Consultation and Written Ministerial Statement 5
1.2 STRUCTURE OF THE REPRESENTATION 6

2 THE SITE AND ITS CREDENTIALS 7
2.1 CASE FOR ALLOCATION 7
Adjacent sites 8
Green Belt 9
Highways and Access 10
Sustainability of the location, including social Infrastructure 12
2.2 OTHER CONSIDERATIONS 14
Trees 14
Public Rights of Way 14
Flood Risk 14
Contamination 14
Archaeology and heritage 14
Noise and air quality 15
Agricultural land value 15
Deliverability 15
Availability 15
Suitability 15
Achievability 16
2.3 COMMENTARY ON THE INTERIM SUSTAINABILITY APPRAISAL OF THE DRAFT LOCAL PLAN 16
Loss of BMV Land 16
Green Belt Coalescence 17
Beyond reasonable walking distance to current public transport services 17
Other sites 18
2.4 SUMMARY 21

3 VISION AND STRATEGIC OBJECTIVES 22
3.1 COMMENTS ON THE PROPOSED VISION 22
Summary 23
3.2 COMMENTS ON THE STRATEGIC OBJECTIVES 24
summary 25

4 SPATIAL GROWTH OPTIONS 26
4.1 HOUSING SUPPLY AND DEVELOPMENT NEEDS 26

4.2 MEETING NEIGHBOURING AUTHORITIES' UNMET NEED 28
4.3 WINDFALL SUPPLY 29
4.4 PREFERRED SPATIAL GROWTH OPTION 30

5 NATURAL ENVIRONMENT 31

5.1 POLICY S1: PLANNING FOR CLIMATE CHANGE 31
Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate? 31
5.2 POLICY S2: CONSERVATION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT 32
Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view? 32
5.3 POLICY S3: NORTH KENT ESTUARY AND MARSHES DESIGNATED SITES 32
Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes. 33
5.4 POLICY S4: LANDSCAPE PROTECTION AND ENHANCEMENT 33
Summary 34
5.5 POLICY S5: SECURING STRONG GREEN AND BLUE INFRASTRUCTURE 34
5.6 POLICY DM1: FLOOD AND WATER MANAGEMENT 35
5.7 POLICY DM2: CONTAMINATED LAND 36
5.8 POLICY DM3: AIR QUALITY 36
5.9 POLICY S7: GREEN BELT 36
Question 8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary? 36
Allocation of site SNF3 to meet GBC's housing need 38
Allocation of Site SNF3 Along with SNF1 and SNF5 39

6 BUILT ENVIRONMENT 41

6.1 POLICY T1: PROMOTING HIGH QUALITY DESIGN 41
6.2 POLICY DM 5: HOUSING DESIGN 41
6.3 POLICY DM6: SUSTAINABLE DESIGN AND CONSTRUCTION 42

7 HOUSING 43

7.1 POLICY T2: HOUSING MIX 43
Question 10: Do you think this policy provides effective guidance on the required housing mix in Medway? 43
7.2 POLICY T3: AFFORDABLE HOUSING 43
Question 11: Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on greenfield sites and higher value urban locations? What do you consider would represent an effective alternative approach? Do you agree with a varied approach for affordable housing requirements based on the different value areas across Medway? 43

Question 12: What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low-cost home ownership housing in delivering affordable housing? 44
Question 13: Do you have any views on the delivery of affordable housing, and the cascade principle? What evidence can you provide to support your views? 44
POLICY T9: SELF-BUILD AND CUSTOM HOUSEBUILDING 44

8 CONCLUSIONS 45

8.1 OVERALL SUMMARY 45
Overall Summary 45
Conclusion 46

Appendix 1 – Social Infrastructure Audit (DHA, Sept 24)

Appendix 2 – Transport Technical Note (Prepared by DHA Transport, Oct 2023)

Appendix 3 – Green Belt Review (Scarp, Sept 2024)

Appendix 4 – Combined masterplan

Appendix 5 – Vision Document

1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

Overview

1.1.1 These representations have been prepared on behalf of Bellway Homes in response to Medway Council's (MC) Local Plan 2041 Regulation 18 consultation document (July 2024). The consultation is a statement of MC's commitment to adopting a new Local Plan in place for the period 2026-2041 (15 yrs) and seeks to provide certainty on the direction of Medway's growth.

1.1.2 Land at Brompton Farm, Stood (hereafter referred to as 'the site') has previously been promoted by Bellway Homes at various consultation exercises run by MC, including the previous Regulation 18 consultation in October 2023 and Call for Sites exercises.

1.1.3 This submission relates on online submission **ID: 2899**.

Plan Context

1.1.4 This consultation is MC's second Regulation 18 consultation (known hereafter as the Regulation 18b consultation). The consultation runs from 15 July to 08 September 2024.

1.1.5 This consultation builds upon the previous Regulation 18 consultation, which was done at a very high level and did not include any preferred strategy for growth. It provided options for growth within the background of an identified housing requirement and a draft "Vision" and "Strategic Objectives".

1.1.6 The current consultation provides an updated vision, strategic objectives, and an overview of the Strategic Growth Options available to the Council (including their preferred strategic growth option), draft planning policies and policy maps (showing indicative site allocations for residential-lead development and employment-lead development).

1.1.7 The Local Plan consultation document provides a list of 44 questions relating to all 13 chapters of the Regulation 18b consultation.

1.1.8 The Council's Local Development Scheme (February 2024) anticipates the Council publishing the Regulation 19 Draft Local Plan in January 2025 for comment.

1.1.9 The primary intention of this representation is to address why land at Brompton Farm Strood (SNF3) should be included as a draft allocation in the Regulation 19 after the Interim Sustainability Appraisal rejected the allocation of the site as part of the earlier Regulation 18 consultation process in October 2023.

1.1.10 This representation submits that the site remains available, deliverable, and achievable within the forthcoming Plan period. It is submitted that the site is sustainable and logical to come forward for development and were it not in the Green Belt it is considered it would have been brought forward for development many years ago. There is no evidence-led basis upon which the site cannot be allocated as part of the forthcoming Regulation 19 Local Plan to help meet the housing needs of MC and the wider subregion.

1.1.11 These representations must be read alongside the completed online form.

Draft NPPF Consultation and Written Ministerial Statement

1.1.12 The Government's proposed reforms to the NPPF (amongst other changes to the Planning System) were unveiled on 30th July 2024 with the publishing of the draft NPPF which will be consulted upon until 24th September 2024. In light of this, given the Labour Government's manifesto and the Housing Secretary's recent Written Ministerial Statement, it seems likely that most of the proposed changes will be published in an updated version of the NPPF shortly after the closure of the consultation.

1.1.13 The draft NPPF was accompanied by a WMS titled 'Building the homes we need', which sets out how the Government is seeking to encourage housebuilding. The WMS sits alongside the draft NPPF and provides specific planning mechanisms to encourage housebuilding and removes exceptions to the application of the presumption, including the removal of Paragraph 226 (i.e., the 4 Year Housing Land Supply exception). Under the revised NPPF, the threshold for the application of the presumption will return to the 5 Year HLS requirement (as well as the Housing Delivery Test requirement).

1.1.14 Within the WMS, the Housing Secretary is clear that the 'Standard Method' currently utilised is *"insufficient to deliver on our scale of ambition"* and is *"not up to the job"*, therefore the Government have proposed a 'Revised Method' which requires Local Authorities to plan for numbers of homes that are proportionate to the size of existing housing stock. In this regard, MC under the Standard Method are required to deliver 1,658 dwellings per annum, whereas under the Revised Method, they are required to deliver 1,644 dwellings per annum. This stands as a decrease in the requirement by 14 dwellings, which is not considered to be significant reduction considering the overall total number of dwellings MC require to deliver per annum.

1.1.15 In regards to the Green Belt the Government are also considering making changes to allow development in the green belt to come forward to meet the housing needs if the site offers limited contribution to the Green Belt's purposes defined at para 143. This includes the introduction of Grey Belt which is defined as:

***Grey belt**: For the purposes of Plan-making and decision-making, grey belt is defined as land in the Green Belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework) but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).*

1.2 STRUCTURE OF THE REPRESENTATION

1.2.1 Below is an overview of the structure of the remainder of the consultation response:

- **Chapter 2** - Provides an overview of the site promoted (Green Belt release at Brompton Farm Strood) once again setting out the reasons why the site should be reconsidered for an allocation;
- **Chapter 3 –** Provides a response to the draft Local Plan and the consultation questionnaire with regards to the vision and strategic options.
- **Chapter 4** - Provides a response to the Council's preferred Spatial Growth Option.
- **Chapter 5** - Sets out a response to policy around the Natural Environment.
- **Chapter 6** - Sets out a response to policy around the Built Environment.
- **Chapter 7** - Sets out a response to policy around Housing.
- **Chapter 8** – Forms the overall summary and conclusions.

1.3.1 Each section includes a "summary", which forms the basis of our response on the online form/platform.

2 THE SITE AND ITS CREDENTIALS

2.1 CASE FOR ALLOCATION

2.1.1 Bellway Homes has continued to promote site SNF3 for Green Belt release throughout MC's previous Regulation 18 consultations and Call for Site exercises to date. It is promoted to provide a sustainable, strategic urban extension of Strood comprising market and affordable housing, and infrastructure which could include public open space, playing fields, a school, and a medical/neighbourhood centre.

2.1.2 The site comprises 44.6ha of Greenfield land in the Green Belt between Brompton Farm Road to the south and Hasted Road (the A289) to the north and Gravesend Road to the west.

2.1.3 The site abuts the urban confines of Strood where residential dwellings associated with Brompton Farm Road is located.

2.1.4 An Illustrative Masterplan, included in the Vision document, from the site SNF3 (***Appendix 5***) supports the submission and shows how the development could come forward. This has been based on the following opportunities below (shown on Figure 5.1):

- Potential new vehicular access into the site from Gravesend Road and a secondary access from Strodes Close;
- Retention of the existing Public Rights of Way (PROW) network across the site and the creation of further pedestrian and cycle links within the site to increase permeability and access to the countryside north of the A289;
- The creation of a self-contained neighbourhood with its own identity and a strong sense of place;
- The provision of a good quality public realm with extensive areas of open space including woodlands, wildflower meadows, a community orchard and green fingers;
- The provision of a neighbourhood centre with small retail units and a medical hub to serve the new community;
- Potential provision of a school to serve the new neighbourhood and surrounding areas;

- Ecological benefits through the provision of woodland and pond habitats and green corridors through the development; and

- Opportunities for play and exercise including areas of linked open space with a variety for play opportunities and a fitness trail with exercise stations.

Insert new masterplan image

Adjacent sites

2.1.5 Bellway consider that site SNF3 is deliverable in its own right as a stand alone allocation in order to help meet the housing needs required in the Local Plan and is available, sustainable and deliverable.

2.1.6 We are also aware and have communicated with the promotors or developers of adjacent sites. These parties are also submitting their own representations to promote their land for allocation. These sites are shown on the illustrative masterplan in ***Appendix 4***. Within the Medway Council boundary this includes Brookworth Homes to the east and BDW Homes to the west.

2.1.7 Whilst we consider that site SNF3 is deliverable in its own right, we have worked with these two parties to demonstrate a coordinated approach can be achieved were the Council to also include these two sites. This has included a joint masterplan which has now included the wider area of BDW and Brookworth land. Were the Council to allocate all three sites in the Regulation 19 Plan we can confirm that the parties have worked together, cooperated and will be able to continue to do so in order to achieve a coordinated and masterplanned approach.

2.1.8 As the sites lie on the boundary of Gravesham Borough Council, we have also considered the wider area. In the last published version of the Gravesham BC draft Local Plan they have identified allocating significant residential housing growth on the boundary with Medway. This land has been promoted by The Church Commissioners (CC). Discussions have been held with Bellway/BDW and The Church Commissioners and the masterplan at ***Appendix 4*** reflects how the area could look if that site too were taken forward in the Gravesham Local Plan.

2.1.9 Bellway consider that they do not need The Church Commissioners (CC) land to be allocated by Gravesham BC in order to make their land either logical, sustainable or deliverable. However, if Gravesham BC were to move forward with their plan including this site (and it has been in the latest plan for over 4 years) it would render the Bellway/BDW/Brookworth land illogical not to also include for development.

2.1.10 The key factor with all of these sites coming forward for release from the Green Belt is that the Brasted Rd A289 has been developed since the Green Belt has been designated. This brings a physical barrier to the north and acts as the strong protection to prevent the settlements of Higham and Strood merging. The Bellway site on its own would have limited or no impact on settlements merging.

2.1.11 As has been stated above Bellway consider that site SNF3 is deliverable in its own right and does not require BDW/Brookworth or CC land to come forward to make it acceptable. However, were BDW and Brookworth also allocated by Medway we have demonstrated how this could work and the cooperation to date. Likewise, were Gravesham BC to allocate the CC land, the masterplan shows how it could work and contact has been made between the parties to deliver a coordinated approach.

Green Belt

2.1.12 Bellway commissioned in independent Green Belt Study ***(Appendix 3)*** to assess the site against the 5 Green Belt Purposes. This study has identified that this land makes a Relatively Weak contribution to Green Belt Purpose 2 in relation to the separation between Strood and the inset settlements of Higham, Shorne and Shorne Ridgeway and a Limited contribution to Purposes 1 and 3. It makes no contribution to Purposes 4 and 5.

2.1.13 It is considered that the Development would not result in any material harm to the Green Belt purposes of prevent neighbouring towns merging into one another (Purpose 2), preserving the setting and special character of historic towns (Purpose 4) or assisting in urban regeneration by encouraging the recycling of derelict and other urban land' (Purpose 5). Whilst the development would result in some harm to the Green Belt purposes of preventing sprawl of the built-up area and encroachment upon the countryside, this harm would be mitigated by the masterplanning proposals and associated compensatory improvements to the Green Belt.

2.1.14 Paragraph 150 of the NPPF requires that once Green Belts have been defined, local planning authorities "*should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity*". The Indicative Master Plan demonstrates the potential to create new, publicly-accessible open space. This would incorporate new woodland, allotments, children's play facilities and formal sports provision, all of which would be available for use by both existing and future residents. The proposed open space also provides the opportunity to deliver enhanced biodiversity, enhanced habitats and enhanced connectivity in the local landscape with new or enhanced walking and cycle routes between Brompton Farm Road and Dillywood Lane and between Gravesend Road and Dillywood Lane.

2.1.15 This study has concluded that the release of the site from the Green Belt would result in an overall limited level of harm to the Green Belt based on its limited contribution to Green Belt purposes and minimal effects on the adjacent Green Belt land north of Dillywood Lane and the A289. Development at Broomhill Rise would not reduce the residual adjacent Green Belt to the extent that it would no longer effectively function as Green Belt land.

2.1.16 The release of this Green Belt land should be considered in the context of the NPPF Consultation Draft published on 30 July 2024, which states that "Where it is necessary to release Green Belt land for development, plans should give first consideration to previously developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations." Grey belt land includes "areas of Green Belt land that make a *limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework)".*

2.1.17 Land at Broomhill Rise is considered to make no more than a limited contribution to the five Green Belt purposes.

Highways and Access

2.1.18 For more information of the Highways network, capacity and accessibility please see ***Appendix 2.***

2.1.19 A pair of bus stops are located on Gravesend Road, approximately 130m (or a 1 to 2 minute walk) from the proposed principal vehicular access. A further pair of bus stops are present on Brompton Farm Road approximately 42m (or a 1 minute walk) from the proposed secondary access. The bus routes and frequencies are shown in Tables 1 and 2.

Service No	Route	Weekday	Saturday	Sunday
190	Gravesend - Chatham	2 – 3 per hour	2 – 3 per hour	1 per hour
668	Chalk – Grammar Schools	1.4	19	4
694	Higham – Grammar Schools	1.6	20	6

TABLE 1 : BUS SERVICES AVAILABLE ON GRAVESEND ROAD

Service No	Route	Weekday	Saturday	Sunday
172	Wainscott – Strood – Chatham	3 per day	No service	No service
633	Cliffe – Grammar Schools	School service	No Service	No service
673	Cuxton – Hoo Academy	School service	No service	No service
689	Darnley Arch – Hundred of Hoo Academy	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

TABLE 2: BUS SERVICES AVAILABLE FROM BROMPTON FARM ROAD

2.1.20 The nearest railway station to the site is Strood, which is located approximately 2.0km (representing a 26 minute walk or a 9 minute cycle) from the proposed secondary site access on Strodes Close. This station is afforded disabled parking, step-free access and cycle storage in the form of covered Sheffield stands for 40 cycles. Table 3 lists the direct train services that are available from this station along with their weekday and weekend frequencies. The station operates services to Rainham, Faversham, Luton, St Pancras International and Tonbridge amongst others.

Service	Weekday	Saturdays	Sundays
Luton via London Blackfriars	2 per hour	2 per hour	No direct service
Ramsgate	1 per hour	1 per hour	1 per hour
Rainham	4 per hour	3 per hour	3 per hour
Paddock Wood	2 per hour	2 per hour	1 per hour
London St Pancras International	4 per hour	3 per hour	3 per hour

TABLE 3: DIRECT TRAIN SERVICES FROM STROOD RAILWAY STATION

Sustainability of the location, including social Infrastructure

2.1.21 The site abuts the urban confines of Strood, a tier two settlement (District Centre) in the proposed settlement hierarchy (See Draft Policy S 16 of the Draft Local Plan). Strood provides essential services and community uses to support sustainable living and create efficiencies in linked trips. Given the locality of the site with its proximity to Strood, on the edge of the existing urban area, and access to the strategic road network and mainline railway stations the site, whilst being in the Green Belt, provides an attractive opportunity for the following (as identified on the illustrative masterplan of the site (***Appendix 5***):

2.1.22 The illustrative masterplan provides opportunities for future allocation to enhance the site's sustainable location through the delivery of residential let mixed use development of 800 homes and:

- Up to 17 hectares of accessible Open Space;
- Extensive pedestrian and cycle routes;
- Retention of existing Public Right of Way network;
- High quality public realm;

- Children's play areas;
- Fitness Trail;
- Community orchards and allotments;
- Small retail units;
- A medical hub;
- A new school;
- New meadow, wooded and wet habitat areas; and
- New homes including affordable provision and self-build options.

2.1.23 To assist ***Appendix 5***, a Social Impacts Audit (SIA) (***Appendix 1***) has been undertaken by DHA. The SIA evaluates the availability, accessibility, and quality of community facilities and services in a particular area and summarises how the proposal at site SNF 3 relates to and seeks to contribute to them. Section 4 of the SIA deals with Social Infrastructure, including demand for new schools.

2.1.24 The SIA concluded that due to the scale of the proposed allocation at site SNF3 (800), a school is highly likely to be required. Depending on updated housing targets set by the government as part of the NPPF consultation (July 2024), a new school may be justifiable if targets are increased, and more houses are delivered. It is considered that an allocation of 800 homes would increase the population by 200 primary school-age pupils. This triggers the threshold for the provision of a new primary school.

2.1.25 It is noted that the indicative masterplan identifies a location for a medical hub. The SIA confirms access to healthcare services such as GPs, pharmacies, and dental practices requires improvement in the local area. Given the above, the SIA sets out that there is scope to incorporate a GP surgery as part of the proposed development. Whilst the provision of pharmacies in Medway is overall sufficient, and there are dental practices located near the site, they could be considered as part of proposals for the site to create a "health hub". The initial masterplan shows an indicative location for a medical hub. It is considered that GP surgery, pharmacy and dental care could potentially form part of this up to serve existing and new residents in this part of Strood.

2.1.26 The SIA also assesses convenience and retail infrastructure in section 4.7 and concludes that a convenience store part of the proposed development would be ideally located to serve the circa 800 new homes as part of the proposed allocation of site SNF3. It also sets out that there are sufficient pubs and restaurants to meet local needs, and as such, this provision will not be required.

2.1.27 The indicative masterplan shows how the site can deliver a small retail offering, which could be a convenience store, to meet this identified need in the SIA.

2.2 OTHER CONSIDERATIONS

Trees

2.2.1 Trees and hedgerows lie within and around the edge of the submission site. None of these are subject to a Tree Preservation Order. Any future application would be accompanied by necessary Arboricultural Surveys with existing trees and hedgerows retained where possible. Therefore, this is not a development constraint.

Public Rights of Way

2.2.2 Two Public Rights of Way cross the site. These can be incorporated into the site without constraining development potential, as demonstrated by the accompanying illustrative masterplan.

Flood Risk

2.2.3 The site lies within Flood Zone 1 and is therefore not at risk of flooding.

Contamination

2.2.4 The site is a greenfield site and is not considered to have a likely presence for contamination and this would therefore not constrain development.

Archaeology and heritage

2.2.5 There are no known heritage assets within or adjacent to the application site. The site is not known to have a presence for archaeology. Mitigation measures and/or a watching brief for any potential archaeological finds can be secured by condition if the Council consider this appropriate at any future planning application stage of development.

Noise and air quality

2.2.6 The site is not within an Air Quality Management Area and so this is not considered to present a constraint. Any noise or air quality related constraints can be addressed through the master planning process of the development.

Agricultural land value

2.2.7 Medway have previously considered the site is best and most versatile agricultural land. This is disputed through the historic uses on the site. Given the need for housing in Medway and the sustainable nature of site SNF3, it is considered to outweigh any current concerns BMV land. An agricultural land classification assessment can be submitted to support the application to demonstrate the site is not BMV land as defined by Annex 2 of the NPPF.

Deliverability

2.2.8 For sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

2.2.9 Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making. We can confirm that there would be no financial restrictions that would impact upon the viability of a housing led scheme or that would prohibit development coming through within the early stages of the plan period. The site is in the control of one of the biggest housebuilders in the country Bellway Homes.

Suitability

2.2.10 For reasons set out in this representation below, site SFN3 is considered suitable for development. In summary, the site borders the currently defined town centre confines and would form a natural, logical and sustainable extension.

2.2.11 Residential development on this site would make a useful contribution to the required housing supply for the plan period for Medway given that it also needs to help meet the needs of Gravesham BC.

2.2.12 Finally, the site is not constrained by access and infrastructure (as demonstrated in ***Appendix 2*** – Transport Technical Note and indicative access drawings), flood risk, pollution or contamination.

Achievability

2.2.13 The site is in two separate ownerships. However, the site is a predominantly green field with limited constraints other than those that cannot, or have already been, proposed to be mitigated as shown on the accompanying illustrative masterplan. The legal agreements and covenants would not prohibit the ability to bring forward the site. Therefore, the site is greenfield development in a sustainable location that can be delivered (started) within the early years (years 1-5) of the plan period.

2.3 COMMENTARY ON THE INTERIM SUSTAINABILITY APPRAISAL OF THE DRAFT LOCAL PLAN

2.3.1 Volume 1 of the interim sustainability appraisal at table 8.14 outlines reasons for the selection and rejection of reasonable alternative strategic sites for the Draft Local Plan. Our client's site SNF3 has been rejected as part of the reasonable alternative sites. The reasons set out by the council were due to:

(1) The loss of BMV agricultural land.

(2) Within the Green Belt- the development could lead to coalescence between settlements; and

(3) Beyond reasonable walking distance to current public transport services.

Loss of BMV Land

2.3.2 It is noted that the Council cited the loss of BMV land as a reason why the site was rejected as part of the interim sustainability appraisal. The Natural England agricultural land classification maps for London and the southeast are high-level maps that provide an indication of where the best and most versatile land lies within the region. It is noted that the site is shown on the Natural England maps to be a location where Grade 1 land can be found. We consider that the Council is over-reliant on the Natural England maps as part of its evidence.

2.3.3 The findings of this are, however, questioned, particularly as part of the land has historically been used for non-agricultural uses, including car parking and other commercial purposes. In this respect, there are numerous concrete pads from former buildings on the site, and in places, rubble to a depth of several feet. This means that some of the land cannot be used for agricultural purposes as machinery cannot be deployed due to the amount of debris below. The only way the Grade of BMV land can be understood is through an Agricultural Land Classification Report, which can be submitted with any detailed planning application.

2.3.4 Given that MC's preferred SGO (Blended Strategy) under delivers the 28,000 homes required to meet its Local Housing Need, the release of Green Belt sites, even on BMV land, needs to be weighed in the planning balance. Therefore, at this stage of the development of the Local Plan, such sites cannot be fully ruled out as part of the interim Sustainability Appraisal.

Green Belt Coalescence

2.3.5 The Green Belt Study ***Appendix 3*** assess the site SNF3 against the five purposes of the Green Belt in paragraph 143 of the NPPF (formally paragraph 139), including part a) to check the unrestricted sprawl of large built-up areas. This is summarised in 2.1.12 – 2.1.17 above. The assessment is clear and sets out that the site is on the urban edge of Strood where the Green Belts openness is impinged on by the A289 and provides a physical barrier restricting/ limiting the growth of the urban area of Strood. Therefore, it is considered that MC have not fully considered the extent of the physical barriers to development within this part of the authority which can check the unrestricted sprawl of large built-up areas and that prevent neighbouring towns merging into one another.

2.3.6 The Council should re-evaluate site SNF3 against the five purposes of the Green Belt in paragraph 140 of the NPPF, reconsidering the physical infrastructure of the A289.

Beyond reasonable walking distance to current public transport services

2.3.7 The Council have considered that the site is beyond reasonable walking distance to 'current public transport services'. Page 10 of the SIA (***Appendix 2***) provides an isochrone map of walking distances from the site. Within a five-minute walking distance (400 m) from the site access lies a number of bus stops on Gray's Inn Road (A2). This set of stops provides services towards Strood (south) and Gravesend (north). The 190 bus services provide 2 to 3 buses per hour on Monday to Saturday and one service per hour on Sunday (see Table 1 of this statement). The route runs south on the A2 and stops off at Canal Road (stop D). From this bus stop, it is a six-minute walk to Strood train station, where there are high-speed services into London and other localised rail services providing connections across the County.

2.3.8 Bus route no. 172 operates on Brompton Farm Road and provides three services per day. Whilst these services are limited, this is a key route for school bus services during the week in term time, providing routes to bus services 633, 673, 689, and 694.

2.3.9 It is noted that the site covers a large area. However, in assessing the site, it is unclear whether or not the Council considered route no. 190 as part of the

assessment of the site in the interim Sustainability Appraisal. It is clearly evident from the submitted SIA (***Appendix 2***) that the site can provide sustainable public transport services to other strategic public transport services such as rail stations and district centre locations such as Strood.

2.3.10 Given the large strategic nature of the proposed allocation of site SNF3, the site has the potential to extend existing bus services to provide improved services for future and existing residents. This can be discussed with the Council and bus operators in the future development proposals at the site.

2.3.11 Allocating the site for 800 residential dwellings would increase the area's critical mass of the population. This could provide the necessary population, along with any other allocated sites in this part of the Medway, to encourage the bus operator to improve the frequency of service no. 172, which only operates a limited timetable along Brompton Farm Road and even enter into the site to the neighbourhood centre to pick up more passengers. Bus services only improve with additional customers and the introduction of 800 homes and infrastructure provides additional patronage allowing for increased services.

2.3.12 It is also emphasised that route no. 190 provides regular weekday services connecting Strood train station to the site. It has also been demonstrated that due to the critical mass of population creation because of the allocation, there are opportunities to improve services along Gravesend Road and Brompton Farm Road.

2.3.13 Therefore, it is considered that the Council have not clearly justified why the site is considered to be beyond reasonable walking distance of current public transport services. It is submitted that the site is within reasonable walking distance to current public transport services with the ability of the bus services to be improved and integrated into the site upon discussion with the council and bus service operators as part of the site's future development.

Other sites

2.3.14 The draft plan relies heavily on delivery in the Hoo area. What is not clear at this moment in time is how the removing of the HIF funding will impact the development of the Hoo and existing rural settlements on the Hoo Peninsula. Therefore, there are still some ambiguities about how many homes will have to be discounted from the rural development category of the potential Housing Supply for Medway.

2.3.15 In terms of sensitivity testing, Appendix B of the Interim Sustainability Appraisal includes an "Assessment of Reasonable Alternative Spatial Delivery Options". Hoo Peninsula is included as B.7 and scores poorly across the board as is shown over from page B12. The plan is looking to deliver over 10,000 units on the Hoo

Peninsula which is 40% of the total housing delivery. Such a reliance on a site where the evidence base shows it performs badly is not considered a sound approach.

2.3.16 Equally there are many sites which have been allocated which are in far more sensitive landscape locations than SNF3. Some of these have a much greater impact on National Landscape designations. Choosing these sites over a SNF3 is considered to be far more damaging to the Boroughs landscape than releasing Green Belt land which is not located in a sensitive landscape location and is a buffer.

B.7 Hoo Peninsula

Table B.7.1: Assessment of the Hoo Peninsula SDO against the SA Framework

SA Objective	Score	Hoo Peninsula: Description of effect
SA Objective 1 (Climate Change Mitigation)	--	The Hoo Peninsula SDO could deliver a minimum of 10,893 homes. The construction and occupation of this large-scale residential development would be likely to **significantly increase GHG emissions** and result in a major negative impact against SA Objective 1.
SA Objective 2 (Climate Change Adaptation)	0	A **small area of Flood Zones 2 and 3** can be found within the SDO, covering less than 5%, and less than 10% of the SDO coincides with areas of low, medium, and high **SWFR**. A negligible impact is identified for SA Objective 2.
SA Objective 3 (Biodiversity)	--	The Hoo Peninsula SDO lies within 400m of **Thames Estuary and Marshes SPA and Ramsar**, **Medway Estuary and Marshes SPA and Ramsar**, and **High Halstow National Nature Reserve** (NNR). The SDO is located adjacent to multiple SSSIs, including **Medway Estuary and Marshes SSSI, Tower Hill to Cockham Wood SSSI, and Chattenden Woods and Lodge Hill SSSI** which is designated to protect nightingales. Some small areas of ancient woodland can be found within the SDO. Development in these areas has potential to significantly increase direct and indirect impacts on biodiversity including through habitat loss/fragmentation, pollution, recreational impacts, and predation of nightingales from cats, therefore a major negative impact on SA Objective 3 is identified.
SA Objective 4 (Landscape)	--	Large sections of the Hoo Peninsula SDO coincides with areas of both **'high' landscape sensitivity and capacity**[1]. The proposed development within the SDO would therefore have potential to alter the rural character and contribute to **urban sprawl** and **reduce the separation between settlements**, particularly between High Halstow and Fenn Street and Chattenden and Hoo. A major negative impact is identified for SA Objective 4.
SA Objective 5 (Pollution and Waste)	--	The A228 is the **main road** serving the Hoo Peninsula. The proposed development within the SDO could potentially expose site end users to higher levels of transport associated air and noise pollution. The SDO is located adjacent and in close proximity to watercourses, including the River Medway, potentially resulting in impacts for **water quality**. Additionally, the construction and occupation of 10,893 homes has potential to **significantly increase air pollution**. Overall, a major negative impact is identified for SA Objective 5.
SA Objective 6 (Natural resources)	--	The SDO predominantly comprises **previously undeveloped land** classed as ALC Grade 1, 2 and 3. The proposed development at this location would result in a significant and irreversible loss of land with potential environmental value, including large areas of **BMV agricultural land**. A small proportion of the SDO also coincides with **MSAs**, with potential to increase the risk of sterilisation of mineral resources. A major negative impact is identified on SA Objective 6.
SA Objective 7 (Housing)	++	The SDO would provide a minimum of **10,893 homes** (approximately 40% of the total housing need). A major positive impact is identified for SA Objective 7.
SA Objective 8 (Health and Wellbeing)	--	The SDO is mostly located **beyond sustainable distances to the majority of healthcare services**, including the Medway Maritime Hospital, GP surgeries and leisure facilities. However, the SDO would provide good access to **open greenspace** and the **PRoW and cycle networks**, facilitating active travel and encouraging healthy lifestyles. Overall, a major negative impact is identified for SA Objective 8.
SA Objective 9 (Cultural Heritage)	--	The SDO encompasses several rural settlements where a number of listed buildings, including several Grade I Listed Buildings, can be found. Some other heritage assets also lie in close proximity to the SDO, including the adjacent Cooling Castle SM which is on the Heritage at Risk register, and Upnor Conservation Area. The proposed development in the currently undeveloped areas has potential to **adversely affect the significance or setting of heritage assets** within the area, and alter historic character. Overall, a major negative impact is identified for SA Objective 9.

SA Objective	Score	Hoo Peninsula: Description of effect
SA Objective 10 (Transport)	--	The SDO is located **beyond the sustainable target distance to railway stations** and is mostly located in areas with **poor access to existing local services**. The SDO is partially accessible for to bus services in some areas, although is wholly located outside of the high-frequency public transport routes. The SDO is partially accessible to pedestrian and cycle network routes. Overall, a major negative impact is identified for SA Objective 10.
SA Objective 11 (Education)	-	The majority of SDO is mostly located **beyond sustainable distances to primary schools, secondary schools,** although a proportion of the SDO would provide sustainable access to primary schools. The SDO is likely to provide good access to further education facilities. Overall, the SDO could potentially restrict accessibility to education opportunities and a minor negative impact is identified for SA Objective 11.
SA Objective 12 (Economy)	+	The SDO is located within **sustainable distances to major employment locations** including Kingsnorth and the Isle of Grain/Thamesport, providing a range of employment opportunities to residents. A minor positive impact is identified for SA Objective 12.

2.4 SUMMARY

2.4.1 MC rejected the site in its Interim Sustainability Appraisal due to the loss of BMV land, the site's location within the Green Belt, and the site's inability to be within reasonable walking distance of public transport services.

2.4.2 It is considered, given the justification above, that the site is in an area that should be released from the Green Belt to provide Medway with the opportunity to meet MC's housing needs. The site is within a suitable walking distance to existing public transport services and provides connections to key transport nodes in Strood. There are also opportunities for the site's future development to improve public transport services.

2.4.3 It is considered that the loss of BMV land should be considered in the planning balance as part of any future planning application given the Council's preferred SGO needs to deliver on the Council's Local Housing Need. Therefore, the reasons for rejection are not considered reasonable at this stage of the Plan-making process.

2.4.4 In terms of evidence base when comparing the site to others which have been chosen the site performs well. The Hoo Peninsula is relied on for a vast number of homes in the plan and performs worse than Strood in the evidence base. In addition, there are sites which are located in sensitive landscape designations and positions over SNF3 which is not.

3 VISION AND STRATEGIC OBJECTIVES

3.1 COMMENTS ON THE PROPOSED VISION

3.1.1 The "Vision" for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.

3.1.2 The "Vision" seeks to provide more sustainable and resilient development and strengthen and enhance Medway's character, including supporting green infrastructure, creating a healthy place to live and work, and providing decent places to live for all sectors and ages of the community. It further highlights Medway as a leading economic player in the region, where it can support the business space and attract new investment. Alongside development, there should also be improved travel choices and infrastructure.

3.1.3 However, the "Vision" is silent on its intention to meet its identified housing need and on its intention to address economic/employment needs. Indeed, the overarching principles for the "Vision" fail to identify housing at all as an important component of the Plan.

3.1.4 Whilst the "Vision" talks in general terms about how development is to be provided, central to the "Vision" must be "how much development is provided" as a matter that is fundamental to the framework for growth and spatial strategy as a determinative matter. This is a significant failing, considering the "Context" identifies "the supply of new homes is central to the Local Plan" (para 2.7).

3.1.5 NPPF (para 15) states that:

> *The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a* ***framework for addressing housing needs*** *and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*

3.1.6 In the absence of the "Vision" setting out its intention of how much development will be delivered, specifically housing development, it does not provide a positive framework for addressing housing need contrary to the NPPF (para 15). This failing is further reinforced by the "Strategic Objectives" (see Section 3 of this Statement), which also does not address the scale of housing provision that should be delivered, contrary to the NPPF (para 20). This underlines the importance of the" Vision", setting out the intentions for growth.

3.1.7 The "Vision" as set out in para 2.1 must be amended as follows (new text in red):

> *Medway has conserved and enhanced its intrinsic cultural and natural heritage and landscapes alongside high quality development to strengthen the area's distinctive character. Medway has achieved sustainable growth through the development of housing, transport, environment, retail, employment and waste and minerals sites that have responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, and reducing and mitigating the risks of flooding, overheating, drought and soil erosion.*

3.1.8 As per our client's previous representation in October 2023, a new paragraph must still be added, or existing paragraphs amended as part of the "Vision" to set out the intention of the Local Plan to meet identified housing and employment needs. The 7th paragraph (un-numbered) could be amended as follows:

> *The Plan will seek to deliver 27,700 new homes to ensure the needs of all sections and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported house building to provide a good quality of life for residents.*

3.1.9 The proposed change aligns with the "Development Needs" (set out in the executive summary of the draft Local Plan, which sets out the approximate housing target of 28,000 homes to be delivered across the Plan Period.

3.1.10 The outline changes are essential to ensure the Plan is "Positively Prepared", "Consistent with National Policy", and therefore "Sound" (NPPF, para 35)

Summary

3.1.11 Contrary to the requirements of the NPPF (para 15), the "Vision" fails to identify the provision of housing as an important component of the Plan and does not set out how much development should be provided for. This is a central component of the plan and a determinative matter for the spatial strategy. In not expressing the amount of development that is to be delivered, the Plan also fails to be positively prepared to provide a suitable framework for addressing housing needs for the delivery of 27,700 new homes.

3.2 COMMENTS ON THE STRATEGIC OBJECTIVES

3.2.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:

- Prepared for a sustainable and green future;
- Supporting people to lead healthy lives and strengthen our communities;
- Securing jobs and developing skills for competitive economy; and
- Boost pride Medway through quality and resilient development.

3.2.2 The strategic objectives, including their sub-objectives, have not materially changed since the previous Regulation 18 consultation. Therefore, our client's concerns remain the same as those previously submitted and are outlined below.

3.2.3 Paragraph 2.2.1 sets out that these objectives "*feed into the wording of policies and how sites and different locations are assessed for potential development*". It is, therefore, notable that there is no strategic objective dealing expressly with the amount of housing that needs to be delivered.

3.2.4 Whilst it is acknowledged that, in general terms, the objective of "*Supporting People to Lead Healthy Lives and Strengthening Our Communities*" mentions in general terms the types of housing to be delivered, it does not set out how much. This is a determining factor in deciding what is the most appropriate spatial strategy and should inform the basis of future strategic policies, as required by the NPPF (para 20 and 23). In accordance with the NPPF (para 11), this should also reflect, as a minimum, the objectively assessed need (27,700 new homes or 1,658 homes pa)

3.2.5 In the absence of clearly setting out the housing requirement and whether the Plan is looking to meet its need (which it should, the process of using the stated objectives to inform the Council's assessment of different sites and locations for development cannot be considered "Positively Prepared" or "Justified," contrary to the NPPF (para 35).

3.2.6 The "Strategic Objectives" must, therefore, be either expanded to include the amount of housing that is to be planned for, which must reflect the objectively assessed need as a minimum (NPPF, para 11b), or a new objective added that identifies this.

3.2.7 The general principles are supported for the spatial objectives more generally. However, they further highlight the need for the amount of development to be planned to be expressed as an objective since many of the other objectives are

dependent on the delivery of housing, including the ambitions for improved employment floorspace and higher-value employment opportunities, which are also reliant on providing enough housing.

3.2.8 More generally, the objectives also only discuss development on brownfield land as part of its regeneration objectives. They do not directly address the need to release greenfield land for development. This is misleading since the release of greenfield sites is essential to meeting the objectives of the Plan and, therefore, must be referenced for clarity.

3.2.9 The consultation document (para 5.11) further mentions that "*the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring authority".* Again, the strategic objectives are silent on this matter, and it must be clarified whether the Council intends the Plan to help address this need, as a matter which is highly formative to the distribution of growth and selection of housing sites.

Summary

3.2.10 The strategic objectives as currently drafted do not provide a "Sound" basis to inform the development strategy, site selection or future planning policies, where they fail to set out the amount of development that is to be planned for. This is fundamental to informing the spatial strategy and policy making, especially in respect of setting strategic policies (NPPF, para 20). The objectives must therefore either be expanded or a new objective added which sets out that the Plan seeks to deliver its full objectively assessed need as a minimum (NPPF, para 11b). Greenfield land must be released to aid the delivery of this.

4 SPATIAL GROWTH OPTIONS

4.1 HOUSING SUPPLY AND DEVELOPMENT NEEDS

4.1.1 The previous Regulation 18 consultation document sets out Medway's development needs, identifying a current housing need of 1,667 homes pa or circa 27,700 over the Plan period (2022-2040). The Government's Standard Method sets out a requirement of 1,658 homes pa. MC set out that this results in a housing need of 26,528 across the Plan Period increasing to 27,854 accounting for the required 5% uplift. This covers a period of just 16 years. Whilst our client supports the Council's ambition to meet its overall housing need the Council need to increase its overall supply by year to reflect the longer plan period required by National policy.

4.1.2 The NPPF (para 69a) requires the Plan to cover a period of at least 15yrs from the date of adoption (para 22). Whilst at face value the Plan would appear to cover the required period, covering 16yrs, this provides little flexibility should Plan preparations stall or examination be delayed, meaning it would fall short of the required 15yrs. Indeed, the Council's published Local Development Scheme (Feb 2024) does not anticipate adoption of the Local Plan until Autum 2026. At this point the Plan would only have 15yrs left, allowing for no slippage, which is highly unlikely.

4.1.3 For the Plan to be considered to be "Positively Prepared" and therefore "Sound", the Plan period must be extended by at least a further year to provide flexibility and to cover inevitable delays in adoption, to ensure it is "Consistent with National Policy".

4.1.4 The Plan period should be increased to at least 17yrs, with a requirement for at least 29,595 new homes, including the 5% buffer.

4.1.5 As evidenced in Table 3.1, the Council has consistently failed to deliver against its housing requirement since 1986, with it last meeting its requirement in only two years back in 2008/09 and 2009/10. This has no doubt led to the current acute shortage of housing in Medway and the current identified need. During this time, the need for affordable housing has also become even more acute, with an identified annual need for 870 affordable homes pa (Medway Local Housing Needs Assessment, October 2021, prepared by Arc4).

Summary of Historic Housing Delivery in Medway			
Year	**Completions**	**Requirement (at that time)**	**Difference**
1986/87	1,118	1160	-42
1987/88	821	1160	-339

1988/89	1,454	1160	294
1989/90	1,467	1160	307
1990/91	391	1160	-769
1991/92	825	900	-75
1992/93	769	900	-131
1993/94	669	900	-231
1994/95	546	900	-354
1995/96	644	900	-256
1996/97	598	900	-302
1997/98	702	900	-198
1998/99	698	900	-202
1999/20	719	900	-181
2000/01	603	700	-97
2001/02	603	700	-97
2002/03	676	700	-24
2003/04	733	700	+33
2004/05	646	700	-54
2005/06	562	700	-138
2006/07	591	815	-224
2007/08	761	815	-54
2008/09	914	815	99
2009/10	972	815	157
2010/11	657	815	-158
2011/12	809	815	-6
2012/13	556	815	-259
2013/14	579	1000	-421
2014/15	483	1,000	-517
2015/16	553	1,000	-447
2016/17	642	1,000	-358
2017/18	680	1,334	-654
2018/19	647	1,683	-1,036
2019/20	1,130	1,662	-532
2020/21	1,087	1,586	-504
2021/22	1,102	1,657	-573
2022/23	1,049	1,658	-609
1986/87-2022/23	**28,465**	**37,385**	**-8,929**

TABLE 4: SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

4.1.6 The Local Housing Needs Assessment at Table 4 identified a need for both market and affordable housing, emphasising the need for the Council to plan to meet its

full objectively assessed need (28,183 homes pa) in full , as required by the NPPF (para 11b and para 23), supporting the Government's objectives to significantly boost the supply of homes (NPPF, para 60).

4.2 MEETING NEIGHBOURING AUTHORITIES' UNMET NEED

4.2.1 The Council also needs to consider paragraphs 11 and 60 of the NPPF to determine whether unmet needs arise in neighbouring areas (Gravesham Borough Council and Tonbridge Malling Borough Council) and whether additional land can be identified to meet some of their housing needs.

4.2.2 It is noted that Gravesham Borough Council through its previous Reg18 consultation requested that Medway Council take 2,000 homes to assist it in meeting its housing need. Under the July 24 draft NPPF consultation the proposed Revised Standard Method increased Gravesham's annual housing requirement by an additional 32 homes on top of its 661 homes pa target (693).

4.2.3 It is currently unresolved as to whether Medway Council intended to assist Gravesham in meeting its housing requirement. Furthermore, neighbouring Tonbridge and Malling Borough Council (TMBC) is also likely to have its housing requirement increased under the Revised Standard Method by a further 237 homes pa taking its total pa requirement to 1,057 homes. Like Gravesham, TMBC is also a highly constrained Borough, with circa 70% of the Borough being Green Belt. It is therefore also highly probable that TMBC will look to Medway as well, to assist in meeting its housing requirement.

4.2.4 Through the evidence available, it is not apparent whether Medway intends to assist neighbouring authorities in meeting their housing requirement, which must be addressed in the context of the NPPF (para 11 and 60).

4.2.5 If Medway Council does not assist neighbouring authorities, then it becomes even more pressing that Medway plans to meet its housing requirement in full, otherwise it will contribute to a worsening housing supply and affordability in east Kent.

4.2.6 As a minimum, the objective to meet the objectively assessed need in full is supported, as required by National policy, with the Council to explore further whether it also needs to plan to meet any needs arising from Gravesham Borough Council or any other Council's (as appropriate) i.e Tonbridge & Malling, which also borders Medway.

4.3 WINDFALL SUPPLY

4.3.1 Windfall development is defined at Annex 2 of the NPPF as sites not specifically identified in the Development Plan.

4.3.2 The NPPF (para 71) sets out that:

> *Where an allowance is to be made for windfall sites as part of anticipated supply, there should* ***be compelling evidence that they will provide a reliable source of supply****. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. (****Our emphasis****)*

4.3.3 The Interim Sustainability Appraisal (para 3.1.2) sets out that after accounting for windfall sites and sites that are already committed, there is a residual requirement to identify 22,491 homes. Based on a housing requirement of 27,854 homes, windfalls and existing commitments make up 5,363 homes or 19% of the overall requirement, which is very significant.

4.3.4 Neither the Plan nor the supporting technical assessments provide any breakdown of what proportion of the 5,363 homes are already committed and what proportion is windfall or indeed what committed sites are being relied upon. In the absence of this information the full 5,363 committed and windfall homes cannot be depended upon.

4.3.5 As acknowledged in the NPPF (para 71), the Council can refer to historic windfall delivery. However, this must be considered in the context that Medway Council has not had an up-to-date Local Plan for some 20yrs. The vast majority of sites that have come forward are therefore not allocated and thus contribute to windfall provision. This significantly distorts the historic windfall delivery rate, and fails to consider that moving forward a larger proportion of future windfall sites are likely to be allocated in the Local Plan, thus also raising concerns in respect of double counting.

4.3.6 Having regard to the NPPF (para 71), this consultation Plan is not supported by any compelling evidence that would justify placing such significant reliance on the windfall supply or that the number is even realistic.

4.3.7 With regards to committed developments, as with the windfall supply, there is no evidence provided which identifies the sites and permissions being relied upon. It can therefore not be determined if the permissions are still extant or if developments have already been completed. Moreover, it cannot be assumed that every consented development comes forward and for the full number of homes that have been granted permission. As such as discount must also be applied to consented development, accounting for under delivering.

4.3.8 Based on the lack of available evidence, it has not been demonstrated that any reliance can be placed on the delivery of committed developments and windfall sites, as part of the Council's housing land supply. This is a significant omission, especially given the level of reliance that is placed on this element of the housing land supply. It can therefore only be concluded at this stage, that the Council has a deficit of at least 5,363 homes against requirements. As such the Plan cannot be considered "Sound", unless sufficient evidence is provided to support Reg19 and/or additional sites are identified to address the deficit.

4.4 PREFERRED SPATIAL GROWTH OPTION

4.4.1 We note that SGO3 is a 'Blended Strategy 'incorporating brownfield regeneration and greenfield sites. Given the Council's significantly higher windfall allocation combined with existing and proposed unmet need for market and affordable homes in Medway and over 2000 homes of unmet need in the neighbouring authorities of GBC and TMBC, it is considered that MC need to allocate additional sites within the administrative area to meet their local housing need and unmet need from neighbouring authorities.

4.4.2 Whilst SGO3 is supported, the number of homes being planned must be re-visited and in all likelihood increased, to account for increasing the Plan period to at least 2042, a review of committed and windfall housing land supply and accommodating (if possible and necessary), growth from neighbouring authorities.

4.4.3 As such, MC needs to consider releasing further housing sites. Given the location of the Green Belt in Medway, it is considered that these locations would be optimal locations to meet any unmet need from neighbouring authorities (GBC and TMBC), and this land should be released from the Green Belt. The below section of this representation provides a Green Belt assessment as to why Site SNF3 is appropriate for Green Belt release.

5 NATURAL ENVIRONMENT

5.1 POLICY S1: PLANNING FOR CLIMATE CHANGE

5.1.1 The Council's draft viability study has Policy S1 labelled as a 'Vision for Medway in 2037'. Policy S1 in the Regulation 18 B consultation document is labelled Planning for Climate Change. The current Policy S1 sets out measures to mitigate the impacts of climate change. There are clear discrepancies between the draft Viability Report and the current consultation document as it does not currently consider the implications for planning for Climate Change and the measures set out above in the consultation document under Policy S1.

5.1.2 Our client supports the Council in mitigating and addressing the impacts of climate change. The viability study, however, does not appear to consider the proposed climate change considerations set out in Policy S1 above, which should be re looked at.

Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?

5.1.3 It is noted that the Council declare the "*climate change emergency*" in 2019 making the move to net zero carbon as a priority. The Council's preferred approach to achieve this is to market new homes achieve a 31% carbon reduction, which is equivalent to the Future Homes Standard option 2. The Council viability report at paragraph 10.47 states that this would increase built cross by 3.1%.

5.1.4 Our client considers that the Council should not go beyond national policy/regulations in addressing climate change. This is because national policy and regulations are continually changing adapting to new and different concerns. For example, the Future Homes Standard (FHS) is anticipated to launch in 2025. The technical consultation on the proposed specification of the FHS took place in Spring 2023; further consultation is to take place throughout 2024, followed by the adoption of the regulations in 2025. From 2025, compliance with the FHS will become mandatory and will ensure that new homes built from 2025 will produce 75-80% less carbon emissions than those constructed under current Building Regulations. The FHS seeks to decarbonise new homes by improving heating and hot water systems and reducing heat waste.

5.1.5 Notwithstanding the above, it is noted that the FHS has yet to be adopted. Significant concerns and risks were raised in the technical consultation relating to the impact of the increased costs of implementing the FHS on house prices and

building costs. In turn, there is a chance that the full impact of achieving net zero could filter through into the viability and subsequent delivery of new schemes. It would, therefore, be prudent for the viability assessment to be re-run, including the scenario within which the FHS is implemented and considering any government funding to ensure that new development is able to achieve net carbon zero and remain viable.

5.1.6 Given the reasons set out above and the example of the FHS we consider that the Council should work policy S1 in a way that is flexible and adaptable enough to meet the ever-evolving requirements of national policy when it comes to meeting the challenges of climate change. The Council do not want to be over reliant on her policy in the future that is out of date with the current national policy at any particular one time.

5.2 POLICY S2: CONSERVATION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT

5.2.1 Policy S2 should remain as is, with proposals only having to demonstrate a 10% net gain in accordance with the Environment Act, as required by law.

Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?

5.2.2 Our client objects to Medway Council's seeking to go beyond the statutory minimum 10% increase in BNG. Brownfield sites such as Waterside Court have higher abnormal costs, and delivering biodiversity net gain above the statutory minimum requirement would be considered to add to these additional costs, causing viability issues for brownfield sites as a whole and is above the legal requirements set out in the Environment Act which came into effect t in February 2024 for major developments. If MC wish to exceed the Environment Act's requirement for 10% BNG, this would need to be tested further by the Council. Any requirement should be proportionate to the proposed scale of development to ensure that development can be viable and fundamentally delivered.

5.3 POLICY S3: NORTH KENT ESTUARY AND MARSHES DESIGNATED SITES

5.3.1 Policy S3 is similar to that currently implemented by the Council through developer contributions as part of any planning application within the zone of influence of the identified areas set out within the policy. Therefore, our client does not object to its premise.

Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

5.3.2 Our client does not object to the tariff-based approach applied to development within 6 km of designated areas. Medway Council already has SAMMS payment as part of the development contributions to a Section 106 agreement or CIL contribution. The contributions are currently clearly set out within the Developer Contributions Guide, which gets updated annually, and this policy just formalises the existing approach in the Local Plan.

5.4 POLICY S4: LANDSCAPE PROTECTION AND ENHANCEMENT

5.4.1 The principles of this policy are for the protection the Kent Downs National Landscape, North Kent pushing development areas of lower landscape sensitivity.

5.4.2 Bellway Homes would continue to encourage MC to use a filtering process to filter out sites of higher landscape value as part of reviewing and assessing potential allocations in the emerging Local Plan.

5.4.3 Site SNF 3 is within the southern part of the Landscape Character Area (LCA) F3 Cliffe Woods. This LCA is classified as an undulating mixed agriculture landscape featuring agricultural, arable, orchards and horticultural uses. It notes that the south-west of the site lies in the Green Belt.

5.4.4 The key characteristics to highlight that the landscape is rural in character and provides a buffer to Strood and Higham. The rural character of the area is undermined in places by busy transport corridors.

5.4.5 Therefore, whilst the site is in a wider character area and seeks to retain the existing rural character of Cliffe Woods, the client site in the south-west part of the LCA has urbanising influences, including the urban edge of Strood and the A2 89, which conflicts with the goals of the Landscape Character Assessment for this part of Medway.

5.4.6 The LCA F3: Cliff Woods is a large landscape character area with multiple different some character areas. It is considered that the landscape area should be split up separating the area around the northern confines of Strood with the wider character area given the urbanised influences that affect this part of the administrative area of Medway.

5.4.7 The illustrative masterplan (***Appendix 1***) demonstrates how any future proposal at site SNF3 it can respect to respond to the key characteristics, sensitivities and qualities of the Landscape Character Area of Cliffe Woods providing appropriate landscaped buffers, planting and considerate location of built development.

Summary

5.4.8 Bellway Homes would continue to encourage MC to use a filtering process to remove sites of higher landscape value when reviewing and assessing potential allocations in the emerging Local Plan.

5.4.9 It is considered that the site SNF3 could come forward as an allocation and comply with policy as currently drafted. If you considered that due to the location of the site between urban edge of Strood and a 29 the site has urban influences and is not wholly within a rural location.

5.4.10 Therefore, it is agreed with the Medway Landscape Character Assessment prepared by LUC that the south-western part of LCA F3 Cliffe Woods has urbanising influences such as the urban edge of Strood and the A228 nine the impact the rural character of this part of the LCA. It is considered that this landscape area should be subdivided splitting the area around the north of Strood off from the more northern part of the LCA is currently need.

5.5 POLICY S5: SECURING STRONG GREEN AND BLUE INFRASTRUCTURE

5.5.1 This policy sets out that the Council will expect developments to demonstrate that they are designed using two, and can adapt to, future impacts of climate change, instructing ecological networks. The figure below is taken from the vision document and shows the Green infrastructure network opportunities that could be provided as part of the illustrative masterplan.

FIGURE 1 GREEN CORRIDORS/ INFRASTRUCTURE THROUGH THE SITE

5.5.2 The illustrative masterplan has been designed to allow development overlooked green space providing natural surveillance allowing green corridors facilitating residential areas subdivided by green fingers and tree-lined streets along with areas of meadow, woodland and formal playing provision to the north of the site allow green connections and corridors throughout the site.

5.6 POLICY DM1: FLOOD AND WATER MANAGEMENT

5.6.1 Policy DM1, as drafted, is aligned with the NPPF. Part of the policy is subtitled "Water quality and groundwater protection," and it requires proposals to comply with the Thames River Basin District Management Plan. The protection of water quality is important. However, Medway should adopt this document as a Supplementary Planning Document as part of its evidence base to help developers and applicants understand what the requirements are. Alternatively, the policy should set out the requirements to meet the measures set out in the Thames River Basin District Management Plan.

5.7 POLICY DM2: CONTAMINATED LAND

5.7.1 The policy sets out high-level principles of how the Council will seek developments to deal with land contamination and potential risks to human health and the environment. At the Regulation 19 stage of the Plan, the Council should set out what supporting evidence is required to be submitted as part of any planning application submitted for major developments.

5.8 POLICY DM3: AIR QUALITY

5.8.1 Any future draft policy at the Regulation 19 stage of the Local Plan process needs to set out the criteria for which development is required to submit such information, i.e., any major planning applications, any applications within an Air Quality Management Area, or other criteria that the Council may consider appropriate. This will clarify what technical information is required at any future planning application stage on our client site.

5.9 POLICY S7: GREEN BELT

5.9.1 Bellway Homes do not object to the principles of this policy, given they reflect the current National Planning Policy.

5.9.2 Medway has only a small proportion of land that is considered Green Belt (4.98%). Despite the small amount of land, the Green Belt retains the strategic gap between the urban areas of Gravesend and Strood and prevents the coalescence of Strood and Higham, Snodland and Halling. However, there are parcels of land within the Green Belt that do not fulfil their role fully when assessed against the five purposes of the Green Belt. These purposes are set out at paragraph 143 of the NPPF. below is an assessment of site SNF3 against the purposes of the Green Belt.

Question 8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?

5.9.3 This question asks whether the consultees consider exceptional circumstances exist to justify review of the Green Belt. This question is asked in relation to policy S7. However, it is considered appropriate to respond to this question in relation to the wider spatial strategy, in particular, Medway's preferred SGO3 (Blended Strategy). In considering whether Green Belt release is justifiable this important and necessary to take a strategic approach take into account the existing circumstances within other Local Planning Authorities in Kent to support any boundary amendments to the Green Belt.

5.9.4 Paragraph 145 of the NPPF sets out the criteria for reviewing Green Belt and the need to promote sustainable patterns of development. Stating that:

> *Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*

5.9.5 As demonstrated in paragraphs 2.1.18 to 2.1.20, the site is in close proximity to Strood (1.6 miles) and Higham (2.6 miles) train stations, providing HS1 and other mainline train connections to London and the southeast. The site benefits from easy access to the strategic road network via the A2. Paragraphs 3.2.7 to 3.2.13 demonstrate that the site is within a 5 minute walking distance of public transport (bus stops on Gravesend Road and Brompton Farm Road) that provides services into Strood District Centre. Therefore, it is considered that the site is well served by public transport and has the ability to improve bus connections to the site, given the scale of the proposed development at the site.

5.9.6 As MC will be aware, draft NPPF was published by the Labour Government in July 2024. Under the transitional arrangements Annex 2 paragraph 226 states that:

> *The policies in this Framework (published on [publication date]) will apply for the purpose of preparing local plan from [publication date + one month] unless one or more of the following apply:*
>
> *(a) the emerging annual housing requirement83 in a local plan that reaches or has reached Regulation 19 (pre-submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure;*
>
> *(b) the local plan is a Part 2 plan that does not introduce new strategic policies setting the housing requirement unless the relevant Local Plan Part 1 has been prepared applying the policies in this version of the Framework;*
>
> *(c) the local plan is or has been submitted for examination under Regulation 2286 on or before [publication date + one month]*

5.9.7 The Council's preferred growth option (SGO 3) provides up to 23,733 dwellings plus it windfall allowance. This would be more than 200 dwellings below the housing requirement across the Plan Period. Even if the Council reaches Regulation 19 (resubmission stage), it is considered that the new NPPF one's adopted will be a material consideration in the examination of the Draft Local Plan. Therefore, MC should consider the Draft NPPF when allocating indicative

locations for residential led development at this stage of the plan-making process. Paragraph 142 of the Draft NPPF sets out that:

> *Once established Green Belt boundary should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of updating of plans. Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial and other development through other means. In the circumstances authorities should review Green Belt boundaries and proposed alterations to meet these needs in full, unless the review provides clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole.*

5.9.8 Given the above, the draft wording of the NPPF explicitly states that not meeting housing needs is an exceptional circumstance for Green Belt Release. As set out in paragraph 2.24, MC preferred SGO or under delivered on the authorities' housing needs. It is submitted that the site SNF3 should be allocated in the Regulation 19 Local Plan as a Green Belt Release site capable of delivering 800 homes towards the identified housing need.

Allocation of site SNF3 to meet GBC's housing need

5.9.9 Paragraphs 3.5.4 to 3.5.9 deal with how Medway can help meet neighbouring authorities' (Gravesham BC and Tonbridge and Malling BC) housing needs. As set out above, Gravesham BC has identified a housing need of 2000 homes from its potential supply that Medway needs to put forward to meet this need. Meanwhile, TMBC needs an uplift of 237 homes per year on top of the existing Standard Method calculation, taking their total supply per year to 1,057 homes per year.

5.9.10 It is understood that GBC as part of its emerging Local Plan wishes to allocate a potential new settlement option on the boundary of Medway immediately to the north of site SNF3, which the Church Commissioners are bringing forward. This land also lies in the Green Belt. Whilst it is noted that the statement of common ground would be needed with GBC to confirm if this proposed new settlement within the Green Belt forwards at this stage the Council and our client know no different.

5.9.11 This representation demonstrates that site SNF3 is in a sustainable location within the proximity to transport and has the ability to be self-sufficient, providing everyday services within the proposed allocation such as school, medical, retail units, and playing pitch provision as indicated by the SIA prepared by DHA planning ***(Appendix 1)*** and set out in Section 2.1 and the illustrative masterplan ***(Appendix 5)***. If GBC were to continue to propose new settlements on the border of Medway and the GBC site, SNF3 would also be able to demonstrate that it can be brought

forward in close proximity with other strategic housing allocations outside of Medway, which could positively impact the occupants of the dwellings.

5.9.12 It is therefore submitted that the site is in an ideal location close to GBC and its Housing Market Areas to help contribute to a both Medway's identified and mapped housing need along with a proportion of GBC's 2,000 unmet housing need.

Allocation of Site SNF3 Along with SNF1 and SNF5

5.9.13 The draft NPPF at paragraph 145 is explicitly clear that Green Belt should be released if an authority cannot meet its housing need. Gravesham BC make it clear that even with Green Belt release that they will not be up to deliver the additional 2000 homes required to meet the housing needs. If MC are concerned about allocating our clients site (SNF 3) individually and how this will meet the needs of Medway, GBC and TMBC another consideration is that the neighbouring sites SNF1 and SNF5 could be brought forward along with our client site SNF3 as part of a comprehensive redevelopment of land south of the A289 to provide a comprehensive urban extension to Strood, providing over thousand homes to meet Medway's and other neighbouring authorities housing needs to comprehensively deal with the wider issue housing need in the County.

5.9.14 Given the unmet need across MC, GBC and TMBC, there is increasing evidence to suggest these three sites SNF1, SNF3 and SR5 should all come forward come forward as part of a wider strategic urban extension to help meet north Kent's housing need delivering much-needed market and affordable housing to cover both market areas in Gravesham and Medway. ***Appendix 4*** shows in masterplan prepared by OSG of how such an urban extension to the north of Strood could come forward.

5.9.15 Given the above, site SNF 3 is considered to be in a sustainable location and would be able to help meet Medway's housing needs either as an independent allocation or as part of a wider allocation along with sites SNF1 and SR5 to meet some of GBC as well as Medway's needs given the sites proximity to the neighbouring authority. As such, it should be allocated as a Green Belt release site in the Regulation 19 Local Plan.

5.9.16 It is considered appropriate to respond to this question in relation to the wider spatial strategy in particular, Medway's preferred SGO3 (Blended Strategy). In considering whether Green Belt release is justifiable this important and necessary to take a strategic approach take into account the existing circumstances within other Local Planning authorities in Kent to support any boundary amendments to the Green Belt.

5.9.17 The Council's preferred growth option (SGO 3) provides up to 23,733 dwellings plus it windfall allowance. This would be more than 200 dwellings below the housing requirement across the Plan Period. Even if the Council reaches Regulation 19 (submission stage), it is considered that the new NPPF once adopted will be a material consideration in the examination of the Draft Local Plan. Therefore, MC should consider the Draft NPPF when allocating indicative locations for residential lead development at this stage of the plan-making process. Paragraph 142 of the Draft NPPF sets out that:

"Once established Green Belt boundary should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of updating of plans. Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial and other development through other means. In the circumstances authorities should review Green Belt boundaries and proposed alterations to meet these needs in full, unless the review provides clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole."

5.9.18 Given the above, the draft wording of the NPPF explicitly states that not meeting housing needs is an exceptional circumstance for Green Belt Release. As set out earlier, MC's preferred SGO is under delivering on the authorities' housing needs. It is submitted that the site SNF3 should be allocated in the Regulation 19 Local Plan as a Green Belt Release site capable of delivering 800 homes towards the identified housing need.

6 BUILT ENVIRONMENT

6.1 POLICY T1: PROMOTING HIGH QUALITY DESIGN

6.1.1 The Policy, as currently drafted, provides a checklist for designing high-quality developments that are reflective of the requirements set out in the NPPF. However, the policy also sets out that all developments should demonstrate sustainability criteria, such as:

(1) Meeting the BREEAM standard of 'Very Good' for both energy and water efficiency; and

(2) Biodiversity 2020, and Building with Nature Standards

6.1.2 These requirements define "what good looks like" and cover the themes of well-being, water, and wildlife, among other references.

6.1.3 We raise concerns about MC ensuring all developments meet the BREEAM 'Very Good' standard for energy and water efficiency as these are requirements currently set out in the Building Regulations so have to be complied with. Therefore, there is limited justification as to why they are being replicated in planning policy.

6.2 POLICY DM 5: HOUSING DESIGN

6.2.1 Bellway Homes is concerned by bullet point 3 of this policy. This policy requirement would be better suited to Policy T4. The requirement for M4 building standards for dwellings can be incorporated into Policy T2: Housing Mix, setting out the mix of M4 (2) and M4 (3) homes, which are all designed to adapt to various living situations.

6.2.2 Moreover, we raise concerns over the policy stating that no more than 5% north-facing single-aspect homes within any one development will be considered. Whilst the premise of this bullet point is in accordance with paragraph 135 (f) of the NPPF, seeking to create places that are of a high standard of amenity for existing and future users, we question how the Council has come to the conclusion that no more than 5% of north-facing single-aspect homes will be considered and enforced against. Detailed evidence should be provided by the council to support this approach in any future policy in any Regulation 19 Local Plan.

6.2.3 The last bullet point of the policy seeks a design for flexible living: successful places that are robust and support 'long life and loose fit' neighbourhoods that are flexible and adaptable to rapidly changing circumstances. Our client has concerns regarding the deliverability of this part of the policy. What standards does the

Council intend to apply to help determine whether something is flexible living, and what are the key design criteria for long-life and loose-fit neighbourhoods? The Council should consider the production of the Supplementary Planning Document (SPD) or details within a Design Code to clearly set out how they wish housing standards to meet such fluid design criteria to help applicants understand what is required of a planning application which may help facilitate the long life and loose fit neighbourhoods set out in the policy.

6.2.4 Ultimately, this policy's last part currently appears intangible. The Council needs to provide further guidance about how long-life and loose-fit neighbourhoods will manifest themselves in the Medway towns.

6.3 POLICY DM6: SUSTAINABLE DESIGN AND CONSTRUCTION

6.3.1 The policy states in its last bullet point that "*All residential proposals shall detail how they are seeking to facilitate working from home within the design, including access to high-speed broadband/internet.*" As part of the vision for site SNF3 Bellway Homes as set out in the vision document for the site provide healthy placemaking includes helping to alleviate traffic and avoid the stress of commuting to work and encouraging homeworking. Therefore, whilst our client supports the premise of this policy this part of the policy is broad brush. The Council needs to consider how this policy will manifest itself in practice. The applicant should provide robust evidence to demonstrate whether this is feasible.

7 HOUSING

7.1 POLICY T2: HOUSING MIX

7.1.1 Policy T2 is considered a strategic policy to ensure that the Council delivers a sustainable and suitable mix of housing to meet local housing needs as set out in the three Local Housing Need Assessments. The Local Housing Needs Assessment (2021), Which Is Part of the Evidence Base for the Emerging Local Plan, states that 1no. and 3no.bed dwellings are currently the lowest housing stock in the district. The assessment also states that there is an overall need for 30 to 35% of dwellings to be flats within the overall housing mix.

7.1.2 We would question the appropriateness of future wording of this policy applying any district-wide percentages for house types as this will likely lead to the delivery of housing types in areas where this is not a localised need. The same applies with respect to the blanket requirement for bungalows on all larger schemes.

Question 10: Do you think this policy provides effective guidance on the required housing mix in Medway?

7.1.3 Given the strategic nature of this policy, it is considered that the policy provides effective guidance, pointing to the latest local housing need report to understand the required site location characteristics.

7.2 POLICY T3: AFFORDABLE HOUSING

7.2.1 it is noted that the Council have an annual net shortfall of 870 affordable dwellings per annum and that this policy seeks to reduce this overall shortfall. Bellway Homes are satisfied with a 30% affordable homes policy on Greenfield sites

Question 11: Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on greenfield sites and higher value urban locations? What do you consider would represent an effective alternative approach? Do you agree with a varied approach for affordable housing requirements based on the different value areas across Medway?

7.2.2 The Council's approach taken to a varied approach of affordable housing requirement based on different value areas across Medway is considered appropriate given the level of needs in different parts of the district.

Question 12: What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low-cost home ownership housing in delivering affordable housing?

7.2.3 Bellway Homes does not object to the principle of having a percentage split relating to social/affordable rent and intermediate low-cost home ownership. It is considered that the policy should use percentages led by the need requirement set out in Table 7.1 of the Local Housing Needs Assessment to inform the percentages to accompany Policy T3.

Question 13: Do you have any views on the delivery of affordable housing, and the cascade principle? What evidence can you provide to support your views?

7.2.4 Paragraph 6.3.13 of the Local Plan consultation document sets out the cascade principle. The market is current failing to deliver Section 106 affordable housing so a cascade approach is considered appropriate to allow for other ways for affordable housing to still be delivered. The preference for on-site delivery of affordable housing, then off-site provision on an alternative site, followed by financial contribution as a last resort is supported.

POLICY T9: SELF-BUILD AND CUSTOM HOUSEBUILDING

7.2.5 Bellway Homes raise no concerns that the policy sets out that sites of 100+ dwellings will be expected to provide no less than 4% plots for self and custom build. The illustrative masterplan and vision document (***Appendix 5***) show that Bellway are already planning to provide self-build options on-site SNF3 as part of any scheme being brought forward.

8 CONCLUSIONS

8.1 OVERALL SUMMARY

Overall Summary

8.1.1 The overall Vision for Medway partly accords with Paragraph 15 of the NPPF setting out the economic, social and environmental priorities for the Local Plan to facilitate Medway becoming a leading regional city. However, the vision is silent on the requirement of Paragraph 15 to require an up-to-date plan to provide a framework for addressing housing need. Delivering homes and new neighbourhood and communities underpins economic investment, social, and environmental priorities as it is a catalyst for place-making which is at the heart of Medway's vision to become a leading regional city.

8.1.2 To support a vision that includes a framework to deliver housing to meet local needs, it is essential to have a strategic objective that supports the delivery of homes and the need for housing, as it is the underlying catalyst for creating the sustainable, resilient and economically driven aspirations for Medway to become a leading regional city. Therefore, a fifth objective is required within the emerging Local Plan at the Regulation 19 stage of development to address housing needs in Medway to deliver the vision of the Local Plan.

8.1.3 Considering the above assessment of the 447 Stage 1 LAA sites across the four residential development options that seek to deliver the 28,312 homes across the Plan period there are concerns over the deliverability of many of the sites across all the options proposed in the consultation document. The reasons are due to:

- Deliverability concerns over the loss of HIF funding and the sustainability of sites in rural development areas;
- The development of Suburban Growth areas that are currently identified as sites of landscape sensitivity/importance;
- Potential viability concerns over the deliverability of sites in all the options due to the cost of remediation measures, the impact of mandatory BNG (from January 2024 for major development sites); and
- Sites deliverability being challenged due to the age/ number of lapsed consents on the site.

8.1.4 Given the concerns raised above and the absence of any further sustainability appraisal of the sites by the Council to date, a conservative estimate is that 10,182

homes can be removed from the potential Housing Supply for the plan period before the Council have discounted any sites at Stage 2 and 3 of the LAA through the sustainability appraisal, which would undertake a full sustainability appraisal of the sites submitted.

8.1.5 What is not clear at this moment in time is how the removing of the HIF funding will impact the development of the Hoo Peninsula and existing rural settlements on the Hoo Peninsula. Therefore, there are still some ambiguities about how many homes will have to be discounted from the rural development category of the potential Housing Supply for Medway. Hoo itself scored poorly in the SA assessment which forms the evidence base for its allocation.

8.1.6 Site SNF3 is well located on the urban edge of the Strood, with it being well served by public transport and the ability for this to be improved. It is considered that were it not for the Green Belt location the site would have come forward for development previously as all other matters make it a logical, sustainable and deliverable site to bring forward. This site is particularly needed due to the need for housing, and concerns over the viability and deliverability of rural settlement expansion on the Hoo Peninsula and the Hoo Development Framework caused by the loss of HIF funding, and the complex viability issues surrounding urban regeneration sites in and around Chatham, Strood and Rainham.

8.1.7 Following the assessment of the opportunity, the site is required to help meet Medway's housing need. In Section 5 the site is considered to be an appropriate site for Green Belt release in accordance with the NPPF paragraph 142. The government are also currently consulting on changes to the NPPF which strengthens the need to release Green Belt sites to achieve housing numbers which have limited contribution to the purposes of the Green Belt. This site sits firmly within this category.

Conclusion

8.1.8 Site SNF3 is sustainable, achievable and deliverable (started) within years 1 to 5 of the Local Plan given its greenfield nature and proximity to Strood. There are no physical or other constraints so significant to hold up delivery. The site can help meet the identified housing needs of Medway that may not be achievable otherwise given the authorities constraints and loss of HIF funding without the use of Green Belt sites.

8.1.9 Bellway would support a preferred development strategy that releases Green Belt land for residential development due to the speed in which greenfield sites can be released to meet the housing requirements of the Local Plan in the first 5 years of the plan period. However, Bellway acknowledges that to deliver the scale of housing required a strategic approach delivering dwellings across all the categories is required to meet Medway's housing need for the plan period.

8.1.10 Therefore, the site SNF3 should be allocated in a draft Regulation 19 Local Plan as a residential led site (with infrastructure) for Green Belt release.

Broomhill Rise

Social Infrastructure Audit

Final Report
September 2024

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Contents

1.0	**Introduction**	**5**
1.1	Overview	5
1.2	Proposed Development	5
2.0	**Policy Review**	**6**
2.1	Green Belt	6
2.2	NPPF Policy	6
2.3	Medway Green Belt Review (2018)	7
2.4	Medway Green Belt Review (2023)	8
3.0	**The Site**	**9**
3.1	Study Area	9
3.2	Walking Distance	10
3.3	Cycling Distance	11
3.4	Connectivity	12
4.0	**Social Infrastructure**	**13**
4.1	Education	13
4.2	Childcare Facilities	17
4.3	Healthcare Services	19
4.4	Sport Facilities	22
4.5	Open Space	27
4.7	Social, Community, & Faith	30
4.7	Convenience Retail	32
4.8	Care Homes	35
4.9	Other Services/Facilities	37
5.0	**Proposed Development**	**39**
5.1	Proposed Services	39
6.0	**Conclusion**	**40**

1.0 Introduction

1.1 Overview

1.1.1 Social infrastructure can be defined by the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities.

1.1.2 DHA Social infrastructure Audits evaluate the availability, accessibility, and quality of community facilities and services in a particular area and summarises how the proposal relates to and seeks to contribute to them.

1.1.3 This document has been prepared on behalf of Bellway Homes LTD by DHA associated with the proposed development at land at Brompton Farm.

aprx. 800
new dwellings.

Proposed Neighbourhood centre

New school

1.2 Proposed Development

1.2.1 The current proposed development is for the development of approximately 800 dwellings, a school and a neighbourhood centre containing small retail units and a medical hub.

New open Space

2.0 Policy Review

2.1 Greenbelt

2.1.1 Medway has only a small proportion of land that is considered Green Belt. Approximately only 4.98% of the Medway's land is designated as Green Belt. Despite the small amount of land, the Green Belt retains the strategic gap between the urban areas of Gravesend and Strood and prevents the coalescence of Strood and Higham, Snodland and Halling. As such, the Green Belt plays an important role in this regard.

2.2 NPPF Policy

2.2.1 The NPPF sets out that the Green Belt serves five purposes:

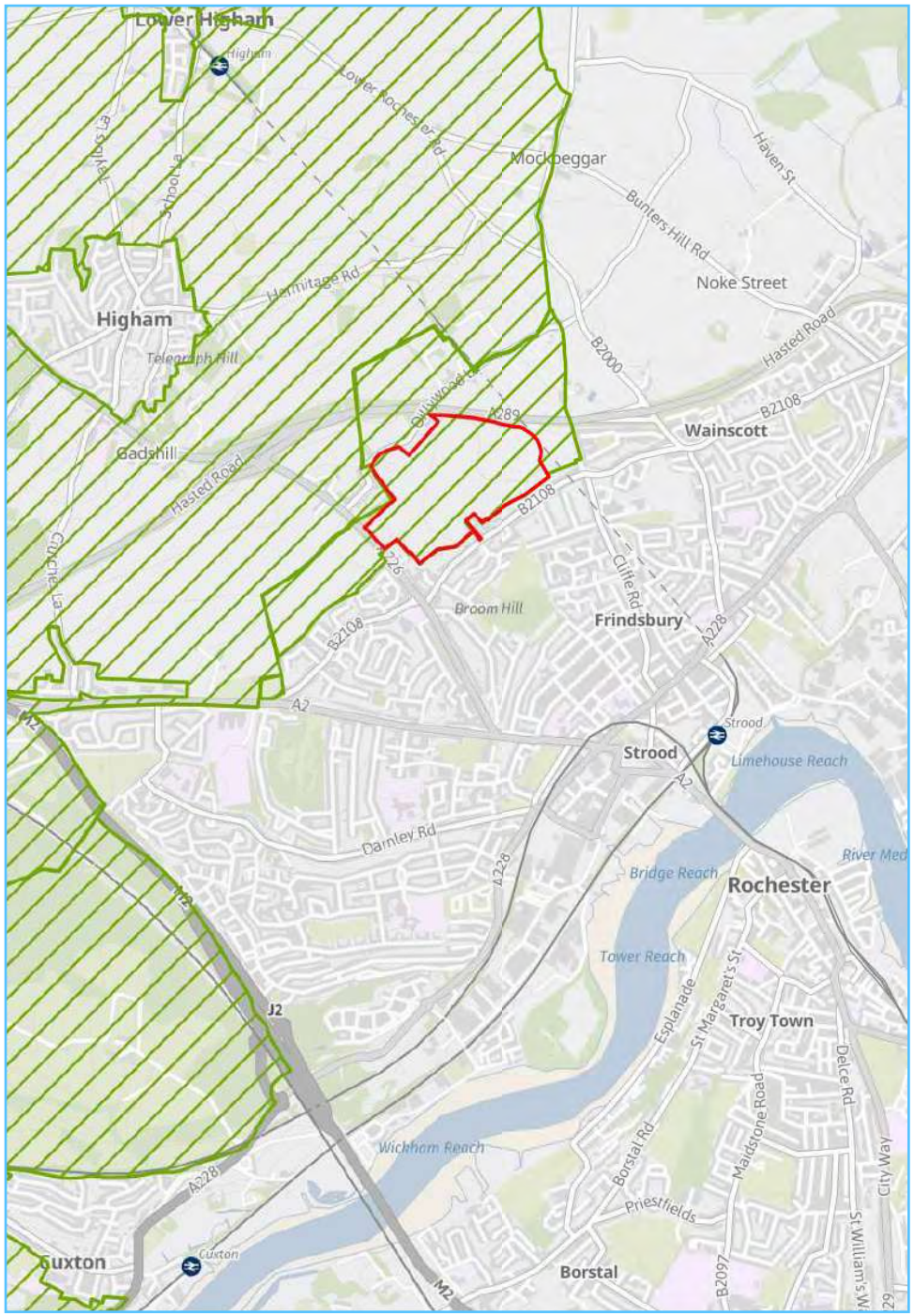
(1) To check the unrestricted sprawl of large built-up areas;

(2) To prevent neighbouring towns merging into one another;

(3) To assist in safeguarding the countryside from encroachment;

(4) To preserve the setting and special character of historic towns; and

(5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.



2.2.2 Policy BNE30 states that:

Within the Metropolitan Green Belt, as defined on the proposals map, there is a general presumption against inappropriate development. Development will not be permitted unless the following objectives are fulfilled:

(i) It is designed and sited so that the open character of the area is maintained; and

(ii) It accords with the purposes of including land in the Green Belt

(iii) New buildings will only be permitted for the following purposes:

(a) Agriculture or forestry;

(b) Essential small-scale facilities for outdoor sport or recreation, for cemeteries or other land uses that fulfil the above objectives; or

(c) A limited extension, alteration or replacement of an existing building; or

(d) Limited infilling within the boundary of Upper Halling

(iv) The reuse of buildings will only be permitted if:

(a) The development fulfils the above objectives, taking into account any proposed extension to the buildings and any associated uses of land surrounding the buildings; and

(b) The buildings are of permanent and substantial construction, and are capable of conversion without major or complete reconstruction; and

(c) The form, mass and general design of the buildings are in keeping with their surroundings.

2.2.3 Policy S7 of the emerging Local Plan (Regulation 18) states that

The Council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

2.2.4 Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

2.2.5 The Council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

2.3 Medway Green Belt Review (2018)

2.3.1 The Medway Green Belt Review divides the Green Belt into five different parcels. The site forms the larger northeastern area of Parcel 2. Parcel 2 is described as the following:

"*The parcel is situated to the south of the A289. The southern edges of this parcel are bordered by the urban fringes of Strood which form Medway's Green Belt boundary within this area. This parcel should be viewed integrally with Parcel*

1. It forms part of a larger tract of Green Belt land which extends beyond the district boundary

into Gravesham (to the north and west). The Green Belt washes over the A289 and A226. Land uses consist of a mixture of arable, horticulture and orchards. The orchard and horticultural uses are focused to the north with arable farmland to the south and west. The land falls away gently to the north west. The landscape character changes according to land uses. The area of polytunnels to the south of Dillywood Lane is more enclosed; the arable farmland and orchard areas more open. The arable farmland to the south west (separated by the A226 and a steep embankment) is distinctly part of the wider green belt farmland extending towards the A289 and beyond. The southern corner of this parcel has recreational sports uses and includes the Rochester City Football Ground. Urbanising influence of A289 to north mitigated by cutting and planted edge."

2.3.2 The Council concludes that Parcel 2 provides a high contribution to the purpose and aims of the Green Belt.

2.3.3 There have also several planning applications related to the site. These applications proposed large scale residential developments of up to 135no. residential dwellings (MC/16/2917) and up to 122no. dwellings (MC/17/2956) which were subsequently both refused due to inappropriate development within the Green Belt and the loss of high-quality agricultural land.

2.4 Green Belt Review (January 2023)

2.4.1 A Green Belt Review was undertaken by Scarp Landscape Architecture to inform the contribution and importance of Green Belt Parcel 2.

2.4.2 The Scarp Green Belt Review describes that the proposals would implement a Green Infrastructure corridor on the north-western part of the site. This corridor provides mitigation to the resulting harm of preventing urban sprawl into the countryside, by delivering enhanced biodiversity, habitat, screening of the proposed development and publicly accessible recreational open space.

2.4.3 The Scarp Green Belt Review notes that whilst the Medway Council Green Belt Review concludes that Parcel 2 provides an overall high contribution to the purpose and aims of the Green Belt, no justification was provided for this assessment.

2.4.4 The Scarp Green Belt Review concludes that, based on the five purposes of the Green Belt, the site makes only a moderate contribution to purposes 1 and 3, a weak contribution to purpose 2 and no contribution at all to purposes 4 and 5.

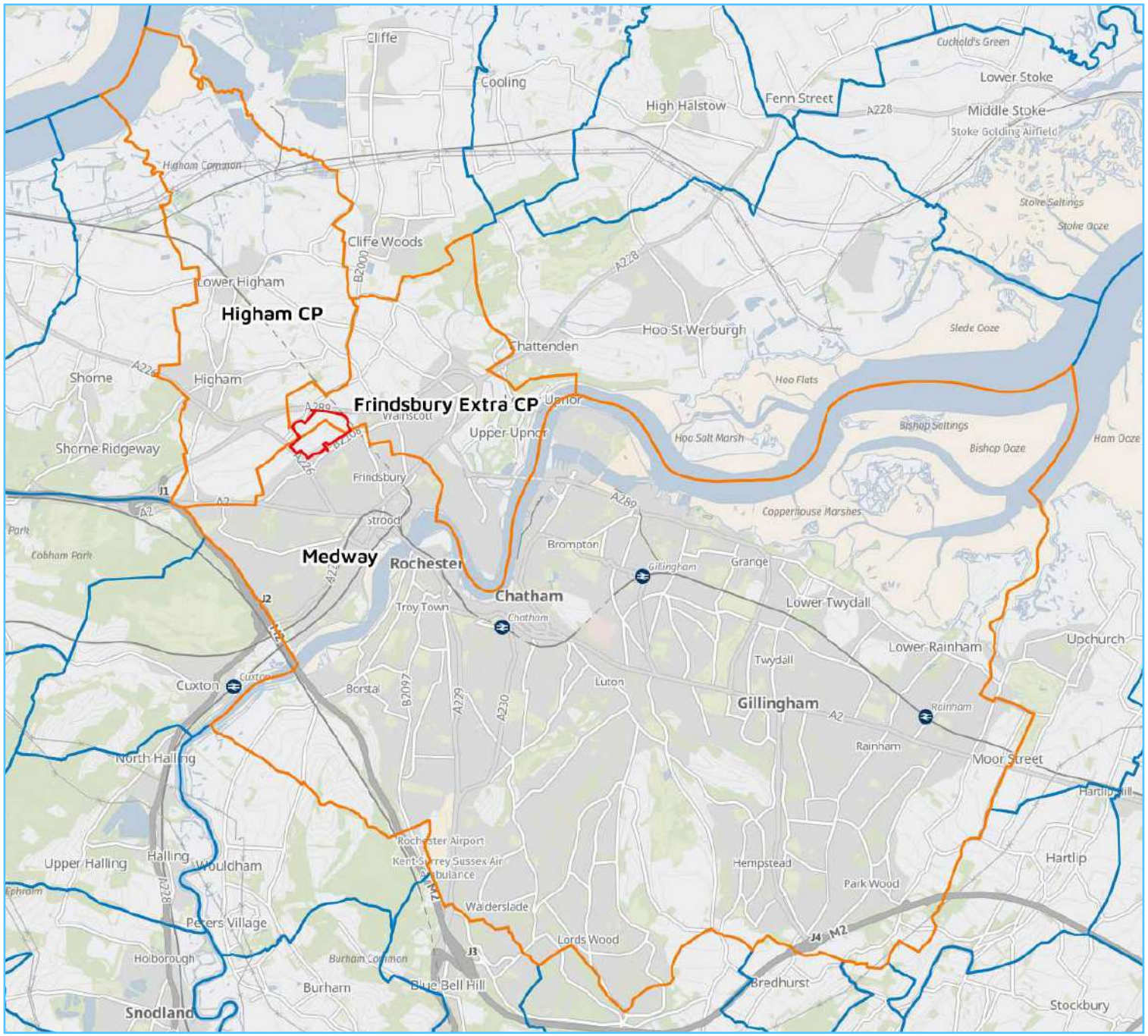
2.4.5 Regarding the development proposal, the proposed housing would result in the extension of built-up area but would not constitute as a sprawl in 'an untidy or irregular way'.

3.0 The Site

3.1 Study Area

3.1.1 The site straddles three parishes; Higham CP, Findsbury Extra CP and Medway.

3.1.2 The survey area extends to a 10 minute drive time from the site boundary in all directions covering a large proportion of Medway.

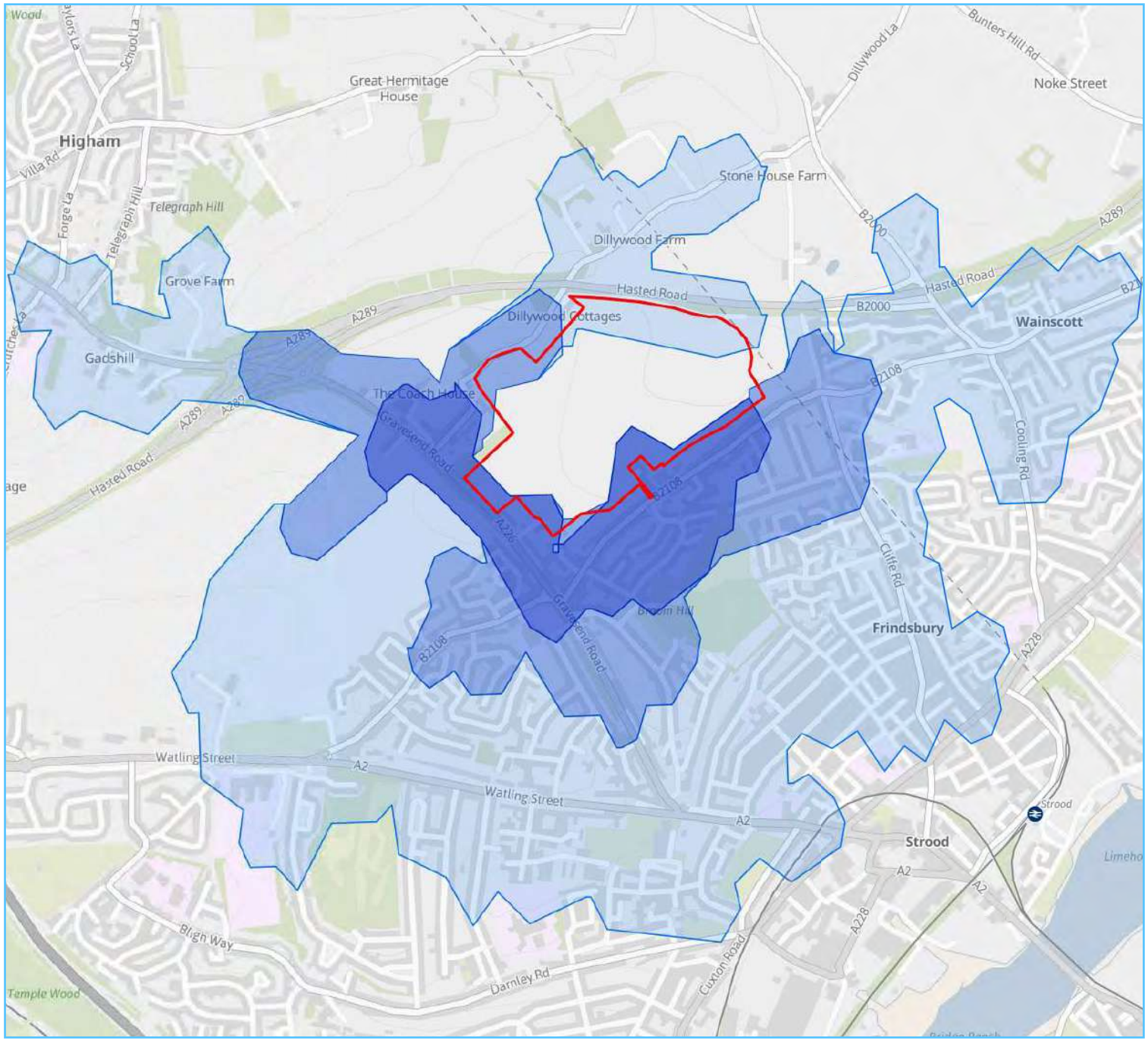


3.2 Walking Distance

3.2.1 An acceptable walk distance is considered to be 1.6km (approximately 20 minute walk).

3.2.2 For this site it is enough to cover most of Strood, half of Wainscott and south of Higham.

3.2.3 Key infrastructure should be accessible within a 20 minute walk distance.



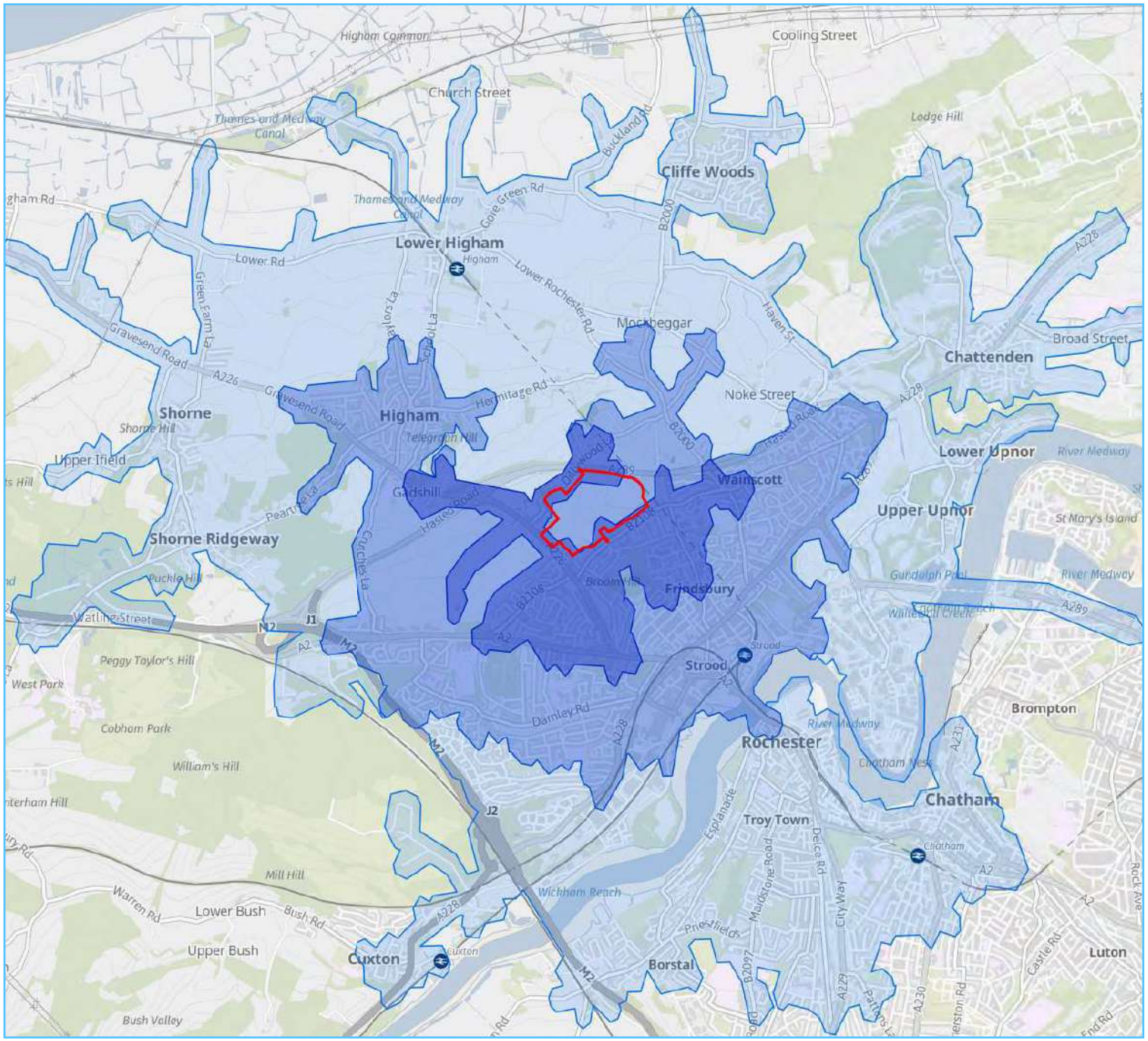
Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access

3.3 Cycling Distance

3.3.1 An acceptable cycling time is considered to be 20 minute cycle (approximately 5.3km cycle) to key infrastructure.

3.3.2 The entirety of Higham and the majority of Strood can be achieved within a 10 minute (2.7km) cycle whilst a 20 minute cycle will reach Rochester, Chatham, Chattenden, Cliff Woods and Lower Higham.



Key

- Site Boundary
- 5 Minute Cycle Distance (1.3km) From The Site Access
- 10 Minute Cycle Distance (2.7km) From The Site Access
- 20 Minute Cycle Distance (5.3km) From The Site Access

3.4 Connectivity

3.4.1 Buses

A pair of bus stops are located on Gravesend Road, approximately 130m (or a 1 to 2 minute walk) from the proposed principal vehicular access, it is noted that this bus stop is serviced by the 190 which provided connection to Strood Town Centre and further into Chatham. A further pair of bus stops are present on Brompton Farm Road approximately 42m (or a 1 minute walk) from the proposed secondary access. The bus routes and frequencies are shown in Tables 1 and 2.

3.4.2 Train

The nearest railway station to the site is Strood, which is located approximately 2.0km (representing a 26 minute walk or a 9 minute cycle) from the proposed secondary site access on Strodes Close. This station is afforded disabled parking, step-free access and cycle storage in the form of covered Sheffield stands for 40 cycles. Table 3 lists the direct train services that are available from this station along with their weekday and weekend frequencies.

Service No	Route	Weekday	Saturday	Sunday
190	Gravesend - Chatham	2 – 3 per hour	2 – 3 per hour	1 per hour
668	Chalk – Grammar Schools	1.4	19	4
694	Higham – Grammar Schools	1.6	20	6

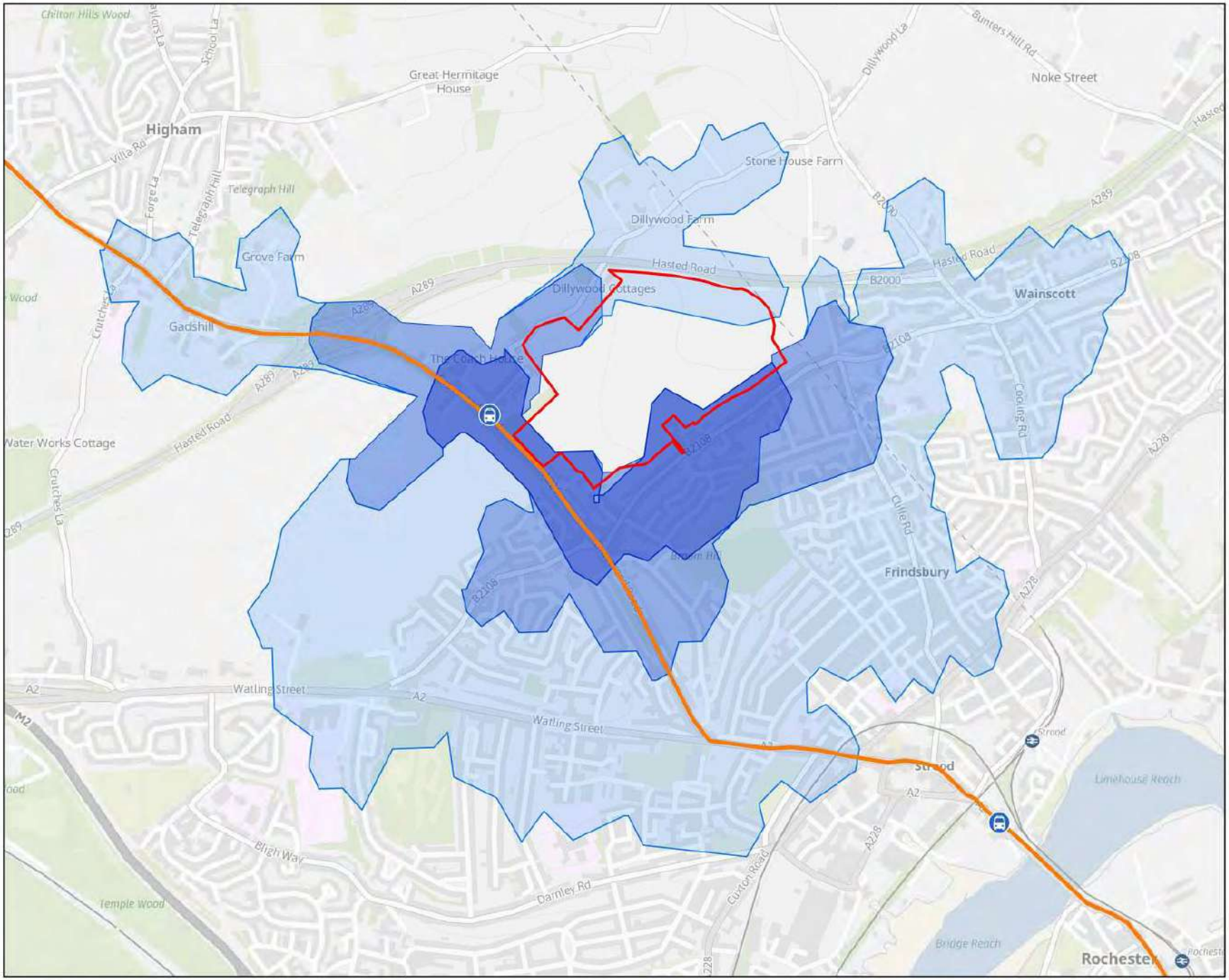
Table 1: Bus services avaliable on Gravesend Road

Service No	Route	Weekday	Saturday	Sunday
172	Wainscott – Strood - Chatham	3 per day	No service	No service
633	Cliffe – Grammar Schools	School service	No Service	No service
673	Cuxton – Hoo Academy	School service	No service	No service
689	Darnley Arch – Hundred of Hoo Academy	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

Table 2: Bus services avaliable on Brompton Farm Road

Service	Weekday	Saturdays	Sundays
Luton via London Blackfriars	2 per hour	2 per hour	No direct service
Ramsgate	1 per hour	1 per hour	1 per hour
Rainham	4 per hour	3 per hour	3 per hour
Paddock Wood	2 per hour	2 per hour	1 per hour
London St Pancras International	4 per hour	3 per hour	3 per hour

Table 3: Bus services avaliable on Brompton Farm Road


Key
Site Boundary
5 Minute Walk Distance (400m) From The Site Access
10 Minute Walk Distance (800m) From The Site Access
20 Minute Walk Distance (1600m) From The Site Access
Bus Stops
190 Bus Route
Chilton Hills Wood
Great Hermitage House
Higham
Villa Rd
Forge La
Telegraph Hill
School La
Bunters Hill Rd
Dillywood La
Noke Street
Stone House Farm
Dillywood Farm
Grove Farm
Hasted Road
Dillywood Cottages
B2000
Wainscott
Gadshill
A289
B2108
Water Works Cottage
Crutches La
Frindsbury
Cuxton Rd
A278
Watling Street
A2
M2
Strood
Limehouse Reach
Bridge Reach
Rochester
Bligh Way
Darnley Rd
Temple Wood
Curton Road

4.0 Social Infrastructure

4.1 Education

Supply

4.1.1 As of 2018, Medway had 112 schools with 18 of the state funded schools being of faith. A breakdown of the varying types of schools are set out in Table 4.

Primary Schools

4.1.2 A total of 4no. primary schools are located within a 20 minute walk distance from the site access.

4.1.3 The closest primary school is Temple Mill Primary School located approximately 970m (12 minute walk) east of the site. The school has a total capacity of 210 students with a current enrolment of 242 students.

4.1.4 The second closest primary school is St Nicholas CoE Infant School which is located approximately 1.4km (19 minute walk) from the south of the site. This school has a capacity of 120 students with a current enrolment of 120 students.

4.1.5 The third closest primary school is Gordon Children's Academy located approximately 1.6km (20 minute walk) away from the east side of the site. The school has a capacity of 400 students with an current enrolment of 320 students.

No.	Type	Number
1	Infant	15
2	Junior	11
3	Primary	52
4	All-Through	1
S	Secondary Selective	6
6	Secondary Non-Selective	10
7	University Technical College	1
8	Special Primary	1
9	Special Secondary	3
10	Special All-Through	1
11	Pupil Referral Unit	2
12	Independent	6
13	Independent Special	3
14	Total	112

Table 4: Breakdown of schools in Medway

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2023/2024
1	Temple Mill Primary School	0.97	12	4	3	242
2	St Nicholas CoE Infant School	1.4	19	4	4	120
3	Gordon Children's Academy	1.6	20	6	5	320
4	Hilltop Primary School	1.6	20	7	4	460

Table 5: Primary Schools in proximity

1. Pupil Numbers www.get-information-schools.service.gov.uk/Establishments

Post Primary Schools

4.1.6 There are 6no. secondary and higher schools located within the search area.

4.1.7 The closest school is Strood Academy which is located approximately 1.6km to the south west of the site. The school has a capacity of 1500 pupils and has a current enrolment of 1302 pupils.

4.1.8 The second closest is Rochester Independent College which is located approximately 3.5km from the south corner of the site. This school has a capacity of 209 pupils and a current enrolment of 205 pupils.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Strood Academy	1.6	20	5	4	1302
2	Rochester Independent College	3.5	47	10	11	205
3	Fort Pitt Grammar School	4.3	61	16	13	932
4	St John Fisher Catholic Comprehensive School	4.3	61	16	13	1094
5	The Rochester Grammar School	5.1	73	21	14	1177
6	University Of Kent Rochester	7.7	105	26	12	unknown

Table 6: Post Primary Schools in proximity

SEN Schools

4.1.9 There are two of Special Educational Needs (SEN) schools.

4.1.10 The closest SEN school is Abbey Court Foundation Special Educational Needs School which is located approximately 0.5km to the south west of the site. The school has a capacity of 205 pupils and a current enrolment of 218 pupils.

4.1.11 The second closest is Abbey Court Community Special School. This SEN school is located approximately 0.8km to the south east of the site.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Abbey Court SEN School	0.5	6	2	1	218
2	Abbey Court Community Special School	0.8	11	3	2	Unknown

Table 7: SEN Schools in proximity

1. Pupil Numbers www.get-information-schools.service.gov.uk/Establishments

Mixed Schools

4.1.12 The only mixed school is Gad's Hill School which is located approximately 1.4km to the northwest of the site. The school has a capacity of 755 pupils and a current enrolment of 386 pupils.

School Demand

4.1.13 According to the School Place Planning Strategy 2018-22, the population of primary age children in Medway from 20,708 in Spring 2009 to 23,966 in Spring 2017, demonstrating considerable growth.

4.1.14 Additionally, the secondary age population is forecasted to increase from 18,774 in 2018 to 21,635 by Spring 2024 and there is a large increase forecasted for 2027.

4.1.15 According to the Department for Education (DfE) in England the average number of students per household in new homes is 0.25 primary and 0.13 secondary school places. With this in mind, a development of c.800 dwellings would expect an increase of 200 primary and 104 secondary school pupils.

4.1.16 Strood Academy, the secondary school located nearest to the site, has a spare capacity of 198 pupils, meaning that the anticipated 104 additional secondary pupils could be accommodated into Strood Academy, and thus, rendering provision of a new secondary school unviable.

4.1.17 Simultaneously, the closest three primary schools to the site do not have the capacity to accommodate the anticipated 200 additional primary school pupils. As such, there is a need for a new primary school.

CONCLUSIONS

4.1.18 It is said that approximately 775no. 2-bedroom dwellings will be expected to provide a new school, rather than developer contributions.

4.1.19 Depending on the size of the development (thought to be c. 800 dwellings), it is highly likely that a new school will be required.

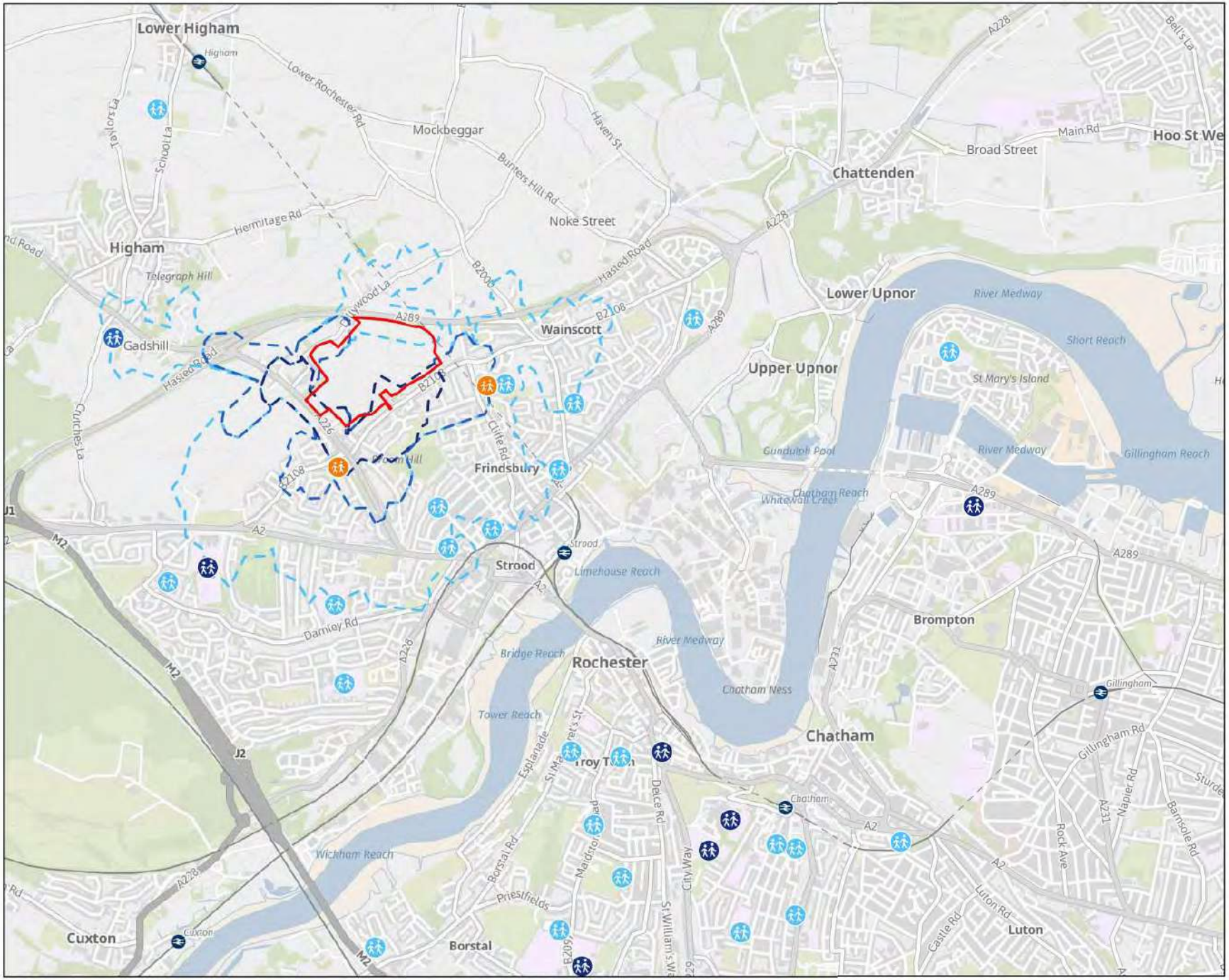
4.1.20 Depending on updated housing targets, a new school may also be justifiable if targets are increased, and more houses are delivered.

4.1.21 The site expects an increase of 200 primary school pupils meaning the provision of a new primary school is recommended.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Gads Hill School	1.4	20	6	2	386

Table 8: Mixed Schools in proximity

1. Pupil Numbers www.get-information-schools.service.gov.uk/Establishments



Key

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- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Post Primary
- Mixed
- Primary
- SEN

4.0 Social Infrastructure

2.2 Childcare Facilities

2.2.1 Grace's Childcare (Childminder) is located immediately outside of the site's southern boundary.

2.2.2 There is pediatrician located to the east of the site (approximately 0.5km /6 min walk).

2.2.3 The nearest nursery to the site is Temple Mill Children's Centre, which is 1km from the site (3 minute drive/13 minute walk).

2.2.4 Other nearby nurseries include Witty Kiddies Strood, which is 1.18km southeast from the site (approximately 25 minute walk or 5 minute drive), and Jack & Jill Playgroup which is 1.9km southeast of the site (approximately 25 minute walk or a 6 minute drive).

2.2.5 There are approximately 15no. childcare facilities located within Strood.

2.2.6 Between the 2011 and 2021 census, the proportion of population aged 4 years and below has decreased from 6.5% to 6.2%.

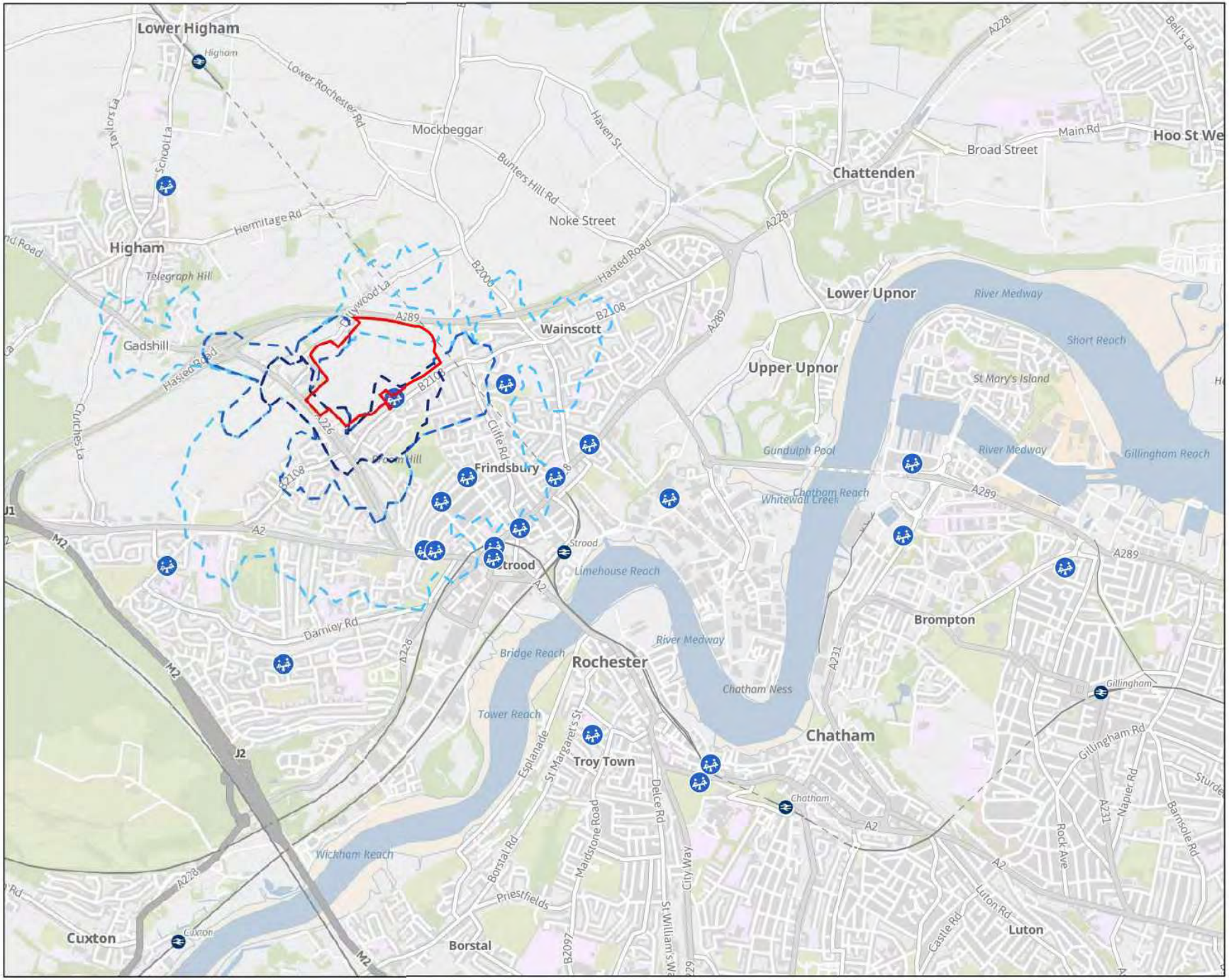
2.2.7 However, depending on the type of dwellings (e.g. higher proportion of 3+ bedrooms), it may lead to an increase in pressure on present capacity of childcare facilities.

2.2.8 Knights Place Rec Play Area has been highlighted as a site that could be expanded to help address the gap in children and youth provision

2.2.9 None of the youth and children provision sites are of low value (i.e. below 20%)

No.	Primary School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)
1	Graces Childcare	0	1	0	0
2	Temple Mill Childrens Centre	0.8	12	4	3
3	Cherubs Montessori	1.3	16	3	3
4	Castle View Childrens Day Nursery	1.3	18	3	3
5	Witty Kiddies Strood	1.6	22	7	4
6	Gordons Childrens Academy, Infant	1.6	22	5	5

Table 9: Childcare Facilities



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Childcare Facilities

4.0 Social Infrastructure

4.3 Healthcare

Pharmacies

4.3.1 According to the Medway Pharmaceutical Needs Assessment (2022), there are a total of seven. pharmacies in Strood, broken down into five. 40-hour pharmacies (second lowest behind Medway Peninsula), one 100-hour pharmacy, and one distance selling pharmacy.

4.3.2 Strood has the 3rd lowest pharmacies per 100,000 population (19.5) which is higher than the Medway average (19.3) but lower than the national average (20.5).

4.3.3 Additionally, access to pharmacies from the site is limited, with no pharmacies located within an acceptable walking distance from the site. The pharmacy nearest to the site is the Amco Medway Pharmacy, which is an approximate 25 minute walk from the site.

4.3.4 The PNA recommends that a rapid review of any area where there is an application to ensure that the needs of the area have not changed in the lifetime of the PNA. This would imply that pharmacy provision is not entirely secure.

4.3.5 The proposed development of c.800 dwellings therefore would create significant pressure upon the existing pharmacies within Strood and provision of a new pharmacy as part of the development should therefore be considered.

General Practice Surgeries

4.3.6 There are a total of 40 General Practice surgeries (GPs) in Medway.

4.3.7 Despite this high number, there appears to be a significant demand for more accessible GP surgeries. As part of survey to inform the Medway Joint Local Health and Wellbeing Strategy 2024-28, approximately 18% of respondents included 'better access to GP services' within their top five rankings, when asked to order what they think is the most important to improving health and wellbeing in Medway.

4.3.8 The perceived lack of accessible facilities is reflected within Strood. There are currently no GPs within acceptable walking distances, with the nearest GP being Court View Surgery, which is an approximate 26 minute walk south, or a 6 minute drive.

4.3.9 Based on the locations of other medical practices, the site would be an ideal location for a new medical practice. Additionally, the proposal for c.800 dwellings would exacerbate any local pressures on existing medical practices. However, any proposal for a GP surgery would need to be informed by a Needs Assessment.

4.3.10 Overall, subject to a Needs Assessment, there is potential for a new medical practice to be incorporated into the development.

The location of the would be ideal to serve the people of the proposed development and would provide a more convenient access to a medical practice to those living in the immediate vicinity of the development.

Dentistry

4.3.11 There are 5 dental clinics within Strood, with the nearest being Louise Lunness-Barnes Dental Clinic, which is an approximate 15 minute walk southwest from site. The other dental clinics are all outside of an acceptable walking distance from the site.

4.3.12 As part of the Medway Integrated Care Strategy, Shared Outcome 4 cites a commitment to improving access to healthcare services, including dental clinics.

4.3.13 The proposed c.800 dwellings would likely create additional pressure for the existing dental clinics in Strood, particularly Louise Lunness-Barnes Dental Clinic, which is located nearest to the site.

4.3.14 A Needs Assessment would be required to fully establish whether the proposed c.800 dwelling development would result in a need for a new dental clinic.

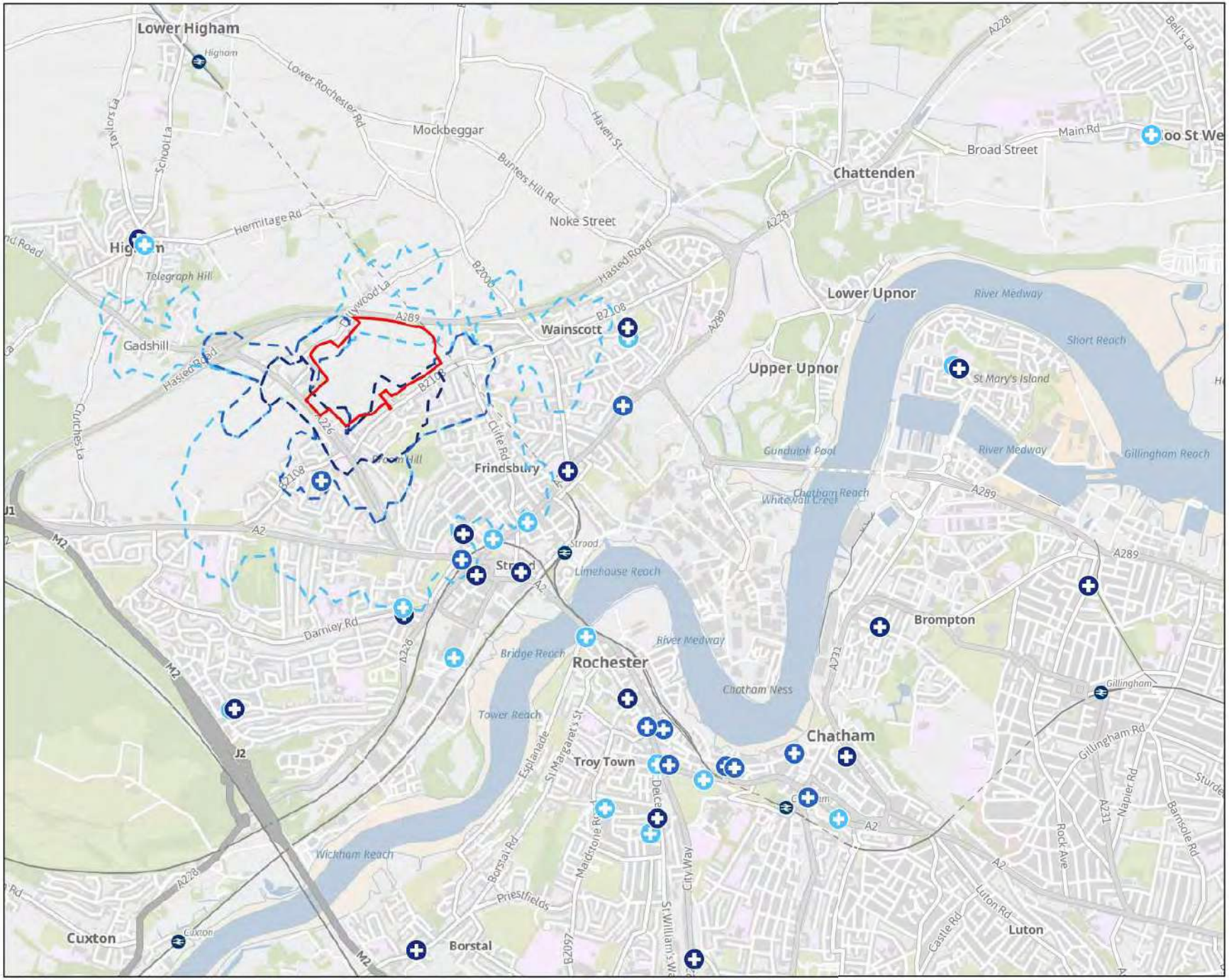
Summary

4.3.15 There are multiple accounts of evidence that access to healthcare services, such as GPs, pharmacies and dental practices, among others, requires improvement.

4.3.16 There is only two dentist located within an acceptable walking distance from the site, and no other healthcare facility is within an acceptable walking distance.

4.3.17 There is scope to incorporate a GP surgery as part of the proposed development. Whilst provision of pharmacies in Medway is overall sufficient, and a dental practice being located near the site, both of these should be considered as part of the proposed development with potential for the creation of a 'health hub'.

Louise Lunness-Barnes Dental Clinic



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Pharmacy
- Dentists
- Medical Clinics

4.0 Social Infrastructure

4.4 Sport Facilities

Grass Pitches Supply

4.4.1 Medway has a total of 165 grass pitches, with the nearest of those pitches located at Rochester United Football Club southwest of the site, which hosts U7s-U13s football teams, Medway District Youth League, and soccer schools, alongside hosting semi-professional football games of Rochester United Football Club.

4.4.2 The supply of grass pitches is shown in Table 10.

	Mini Soccer 5v5	Mini Soccer 7v7	Youth Football 9v9	Youth Football 11v11	Adult Football	Total (%) of total number of pitches)
Good	0	1	0	0	30	31 (18.8%)
Standard	15	14	13	7	60	109 (66.1%)
Poor	3	8	2	3	9	25 (15.2%)
Total (% of total number of pitches)	18 (10.9%)	23 (13.9%)	15 (9.1%)	10 (6.1%)	99 (60%)	165

Table 10: Grass Pitches. Source: 4global site assessments

Grass Pitches Demand

4.4.3 Currently, there are 388 football teams within Medway. Of these 388 teams, 51 are situated within Strood and Rural. The age categories of these teams are broken down in Table 11.

4.4.4 According to the Playing Pitch Strategy Needs Assessment, the club to team ratio in Medway (1:4.5) is higher than the national average (1:3.3) which signifies an increased demand for playing pitches in Medway compared to the national average.

Sub Area	Adult		Youth Teams				Mini Teams		Total
	Men's	Ladies	Boys		Girls		Mini Soccer		
			11v11	9v9	11v11	9v9	7v7	5v5	
Strood and Rural	15	0	9	7	0	0	10	10	51

Table 11: Team profile for football in Strood and Rural

4.4.5 Forecasting predicts that there will be an additional 61 football teams by 2035, including approximately 17 additional adult men's football teams and 16 additional youth boys football teams (figures rounded up). Strood and Rural is forecasted to have the third largest increase in football teams by 14 additional teams, almost a quarter of all new football teams by 2035.

4.4.6 Latent demand in Strood and Rural includes generation of another 6 teams, which includes two adult teams for Medway Lions, two adult teams for Riverside and two U16s teams for Woodpeckers FC.

4.4.7 In addition to team generation, existing playing pitches are also experiencing overplay, measured in Match Equivalent Sessions (MES), where the recorded demand for a pitch exceeds the weekly carrying capacity of that pitch.

4.4.8 Strood and Rural has the second highest amount of overplay on existing pitches and the second lowest available spare capacity of 11v11 adult pitches. Strood and Rural currently has the highest deficit of overplay of 24 MES with the deficit set to increase to 28 by 2035. This suggests that there is a high demand for 11v11 adult playing pitches.

4.4.9 11v11 youth playing pitches are also projected to have a deficit of 4.51 MES by 2035.

4.4.10 Pitches for other categories of football, including 9v9 youth and mini 7v7 and 5v5 pitches within Strood and Rural, are projected to have surplus capacity by 2035.

Rochester United FC

4.4.11 Overall, it is thought that the development presents an opportunity to satisfy current and future demand of 11v11 adult and youth playing pitches, and to alleviate the overplaying of existing football pitches, which should be undertaken.

Artificial Grass Pitches Supply

4.4.12 A total of 9 artificial grass pitches (AGP) have been identified within Medway which are split by the following:

- Two 11v11 (youth and adult) pitch;
- One 9v9 pitch;
- Three 7v7 pitches;
- Three 5v5 pitches.

4.4.13 The nearest AGP to the site is at Strood Academy, which is located 1.8km southwest of the site, an approximate 26 minute walk.

Artificial Grass Pitches Demand

4.4.14 The Football Association's (FA) suggested ratio of fully sized AGPs to football teams is 1:38. Given that there are only two fully sized AGPs within Medway and a total of 338 football teams in Medway, this results in a deficit of nine fully sized AGPs.

4.4.15 Despite the deficit, there is demand for only five (rounded) full sized AGPs by 2035 has been identified. Of the five pitches, demand for a single AGP (rounded from 0.48) has been identified within Strood and Rural, which is only the fourth largest demand out of the six sub-areas.

4.4.16 In addition, Strood Academy has spare capacity of 31 MES, demonstrating significant additional capacity. Securing a community use agreement for use of this pitch would satisfy the low demand within Strood and Rural without the need to build a new AGP.

4.4.17 Given the low demand of AGPs within Strood, and the high demand of grassroots pitches within Strood, incorporation of an 11v11 grassroots pitch within the proposed development would likely be more favourable to build than an 11v11 AGP.

Rugby Union Supply

4.4.20 There are a total of 24 sites in Medway that have rugby union pitches. Four of these sites are available for community rugby usage.

4.4.21 The nearest rugby pitch provision to the development site is Lordswood Sport and Social Club, which is one of two rugby pitches in Strood and Rural, the other being Cliffe Playing Field.

4.4.22 The overall quality of rugby pitches across Meway is healthy, with 18 out of 24 rugby pitches being rated as Standard or Higher as part of the site assessments.

4.4.23 Currently, Medway as a whole has a deficit of 9 MES for training pitches, but a surplus capacity of 11 MES for match pitches. Strood's capacity is marginal, with a deficit of 1 MES for training pitches, but a surplus of 1 MES for match pitches.

Rugby Union Demand

4.4.24 A total of five rugby clubs play in Medway, amounting to a total of 40 rugby union teams. Forecasts for additional rugby teams is small, although it is predicted by 2035 that there will

be seven additional rugby union teams by 2035. There is also latent demand of six new rugby union teams of differing age categories.

4.4.25 By 2035, Medway as a whole will experience a deficit in both training (18 MES) and match (5 MES) pitches. Strood's deficit in training pitches will decrease to 3 MES but will still have a 0.5 MES surplus of match pitches. However, there are other areas in Medway, such as Rochester and Chatham, with less capacity than Strood and Rural.

Other

4.4.26 Regarding demand for other forms of playing pitches, the following conclusions can be made:

- The whole of Medway will have a surplus of artificial and grass wickets by 2035, with Strood and Rural projecting to have the second largest surplus out of the sub-areas (behind Rainham);
- Future demand for hockey teams is relatively low, and despite hockey pitches being oversubscribed on Saturdays (3.75 MES), there is plenty of spare capacity to accommodate demand on weekdays (39 MES) and Sundays (6.5 MES) by 2033;
- Three out of four bowls clubs consulted stated that they are steadily losing members, with the RACS Bowling Club collapsing due to a lack of members;
- Approximately 79% of public tennis court capacity it utilised in Medway, compared to the national average of 53%m, although this utilisation would increase to 94% by 2035 based on population increase forecasts.

Summary

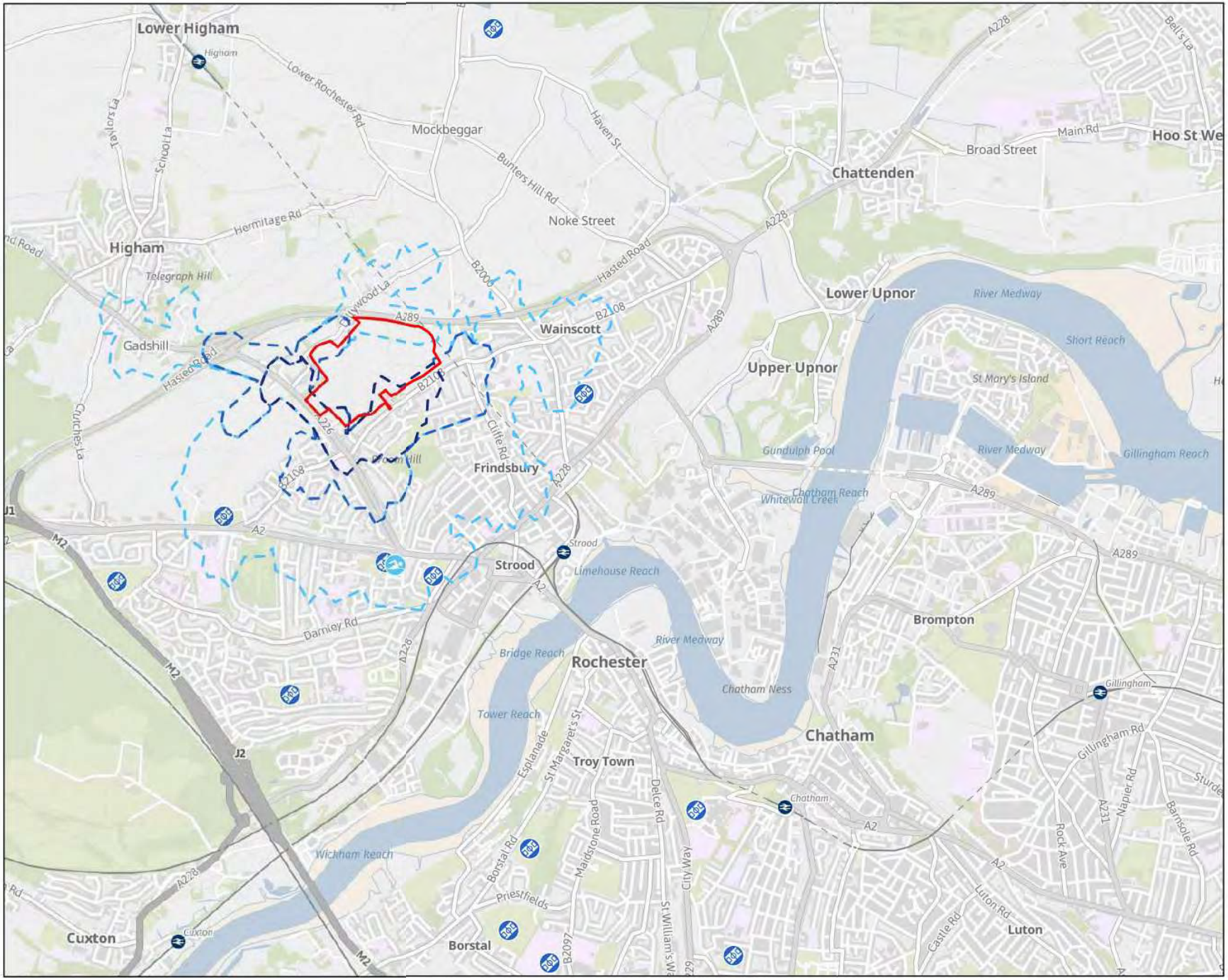
4.4.27 Overall, by far the largest demand for playing pitches comes from football clubs.

4.4.28 In particular, there is significant current demand for adult 11v11 football pitches and 11v11 youth football pitches, which is expected to increase by 2035.

4.4.29 Demand for grass pitches is higher than AGPs, although a community use agreement at Strood Academy's AGPs would provide an artificial pitch with high capacity to the community.

4.4.30 There is an overall demand for training and match rugby pitches within Medway, although this demand is lower than football pitches, and there are other sub-areas within Medway with larger demand than Strood and Rural.

4.4.31 Other sports clubs in Strood and Rural don't have a significant demand for additional capacity of playing pitches.



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Sports
- Leisure Centre

4.5 Open Space

Local Policy & Assesment

4.5.1 Policy L4 of the Medway Local Plan states that:

> *"Residential development likely to be occupied by 100 people or more shall include well located local open space for formal recreation on-site at a standard equivalent to 1.7 hectares per 1,000 population and open space for children's play and casual recreation on-site at a standard equivalent to 0.7 hectares per 1,000 population. Provision of some or all of the formal open space off-site or the improvement or extension of an existing off-site facility will be permitted where the council is satisfied that this would be a better alternative;"*

4.5.2 Policy of the Emerging Local Plan states that residential-led developments will be required to provide new open space and playing pitches according to the following accessibility and quantity standards shown in Table 12.

4.5.3 Alongside the Local Plan Policies, the Council's Open Space Assessment (2024) has been used to inform the provision and quality of various open spaces, in which the subsequent section discusses.

Open Space Type	Catchment	Quantity per 1,000 people
Parks and Gardens	9-minute walk time (710m)	0.80 ha
Natural and Semi-Natural Green-space	9-minute walk time (720m)	3.09 ha
Amenity Greenspace	6-minute walk time (480m)	0.80 ha
Local Area of Play (LAP)	1-minute walk time (100m)	0.25 ha
Local Equipped Area for Play (LEAP)	5-minute walk time (400m)	
Neighbourhood Equipped Area of Play (NEAP)	12.5-minute walk time (1,000m)	
Other Provision	9-minute walk time (700m)	
Allotments	No Standard Set	0.25 ha

Table 12: Accessibility and quantity standards

Parks

4.5.4 Strood has the lowest provision of public parks and gardens per 1,000 population, amounting to 0.19ha per 1,000 population as a result of 1 park (Broomhill Park) totalling 4.52ha.

4.5.5 The site is located within close proximity to Broomhill Park, although is not fully contained within the 9 minute walk target.

4.5.6 Broomhill Park scores highest out of any park in Medway on quality (78.5%).

Natural and Semi-Natural Green space

4.5.7 Out of 60 sites in Medway, Strood has just 1 site (Rede Common) amounting to 11.03ha which is the second lowest in Medway. Additionally, the site is not located within the 9 minute walk target.

4.5.8 Similarly, to Broomhill Park, Rede Common scores highly in quality (72% - 6th highest out of 60 sites).

Amenity Greenspace

4.5.9 Out of 165 sites, Strood has 23 amenity greenspace sites, amounting to a total of 18.85ha and an overall provision of 0.78ha per 1,000, just below the Medway average.

4.5.10 The vast majority of Strood is covered by the 480m catchment area (6 minute walk) for amenity green spaces, with few sparse pockets where the area isn't covered by the catchment area.

4.5.10 However, 20 out of the 23 amenity greenspaces within Strood were categorised as 'low quality'.

Provision for Children and Young People

4.5.11 Out of 163 sites in Medway, Strood has 15 sites for children and young people totalling 0.96ha, or 0.04ha per 1,000 people.

4.5.12 Strood has 10 LEAP and 5 casual/youth sites but has no LAP or NEAP provision.

4.5.13 The overall quality of youth and children is mixed but generally good, with 10 sites scoring over 60% in terms of quality, and 5 sites scoring below 60%.

Allotments

4.5.14 Medway contains a total of 38 allotments, with Strood containing just four of these sites.

4.5.15 The closest allotment to the site is Broomhill Road, which is approximately 0.6km south of the site, or an approximate 4 minute walk.

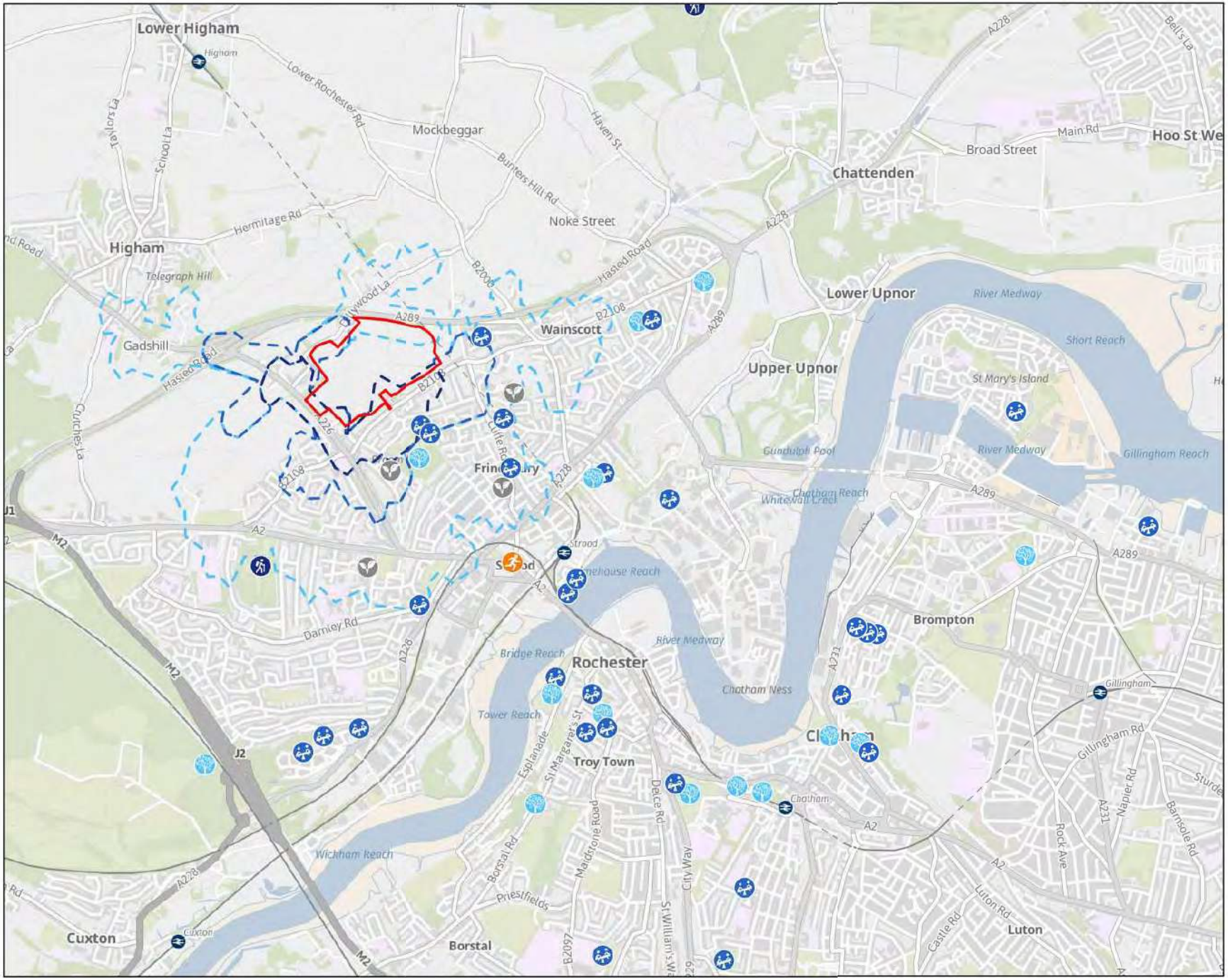
4.5.16 Overall, there is no significant demand for allotments, but they should be highly valued within the community.

Summary

4.5.17 According to local policy, provision of open space is required as part of any residential development.

4.5.18 Strood contains no provision of Local Play Areas or Neighbourhood Equipped Areas of Play and provision of such amenities would be appropriate.

4.5.19 Due to the lower numbers of parks and natural/semi-natural greenspaces, provision of such amenities would be appropriate.



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Trail
- Playground
- Park
- Civic Space
- Allotments

4.0 Social Infrastructure

4.6 Social, Community, & Faith

4.5.1 There are several different community facilities and services within proximity of the site. For places of worship there are several churches in Strood, in Rochester there's a Synagogue and a Mosque.

4.5.2 There are no libraries or community centres within walking distances however the closest library is the Medway Archives Centre located approximately 1.4km (22 minute walk) and the closest community centre is All Saints Parish Hall located approximately 1.8km (24 minute walk) from the site.

Medway Archive Centre

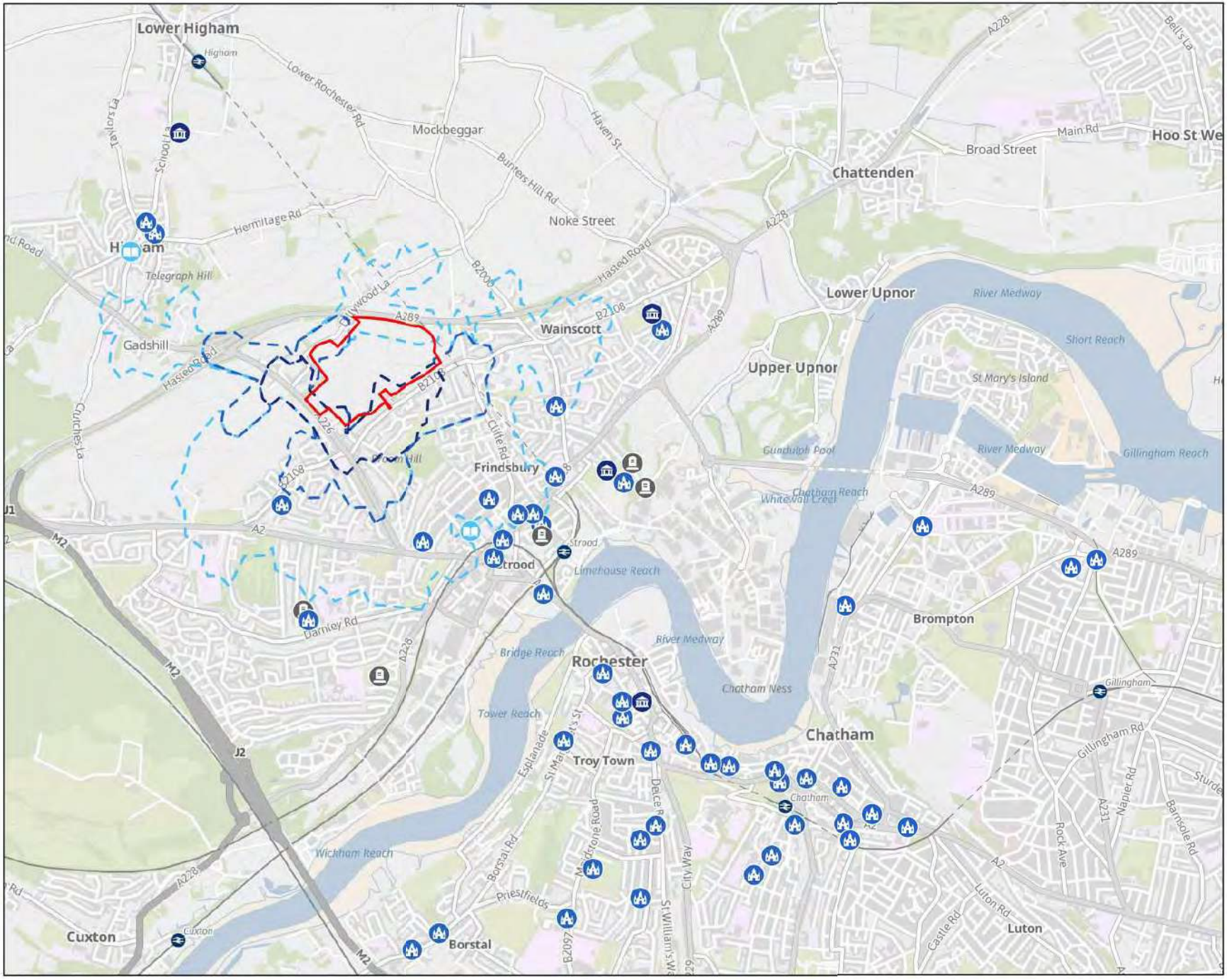
Cemetaries & Churchyards

4.5.3 Out of 79 cemeteries which provide a total of 67.87ha in Medway, 6 are located in Strood and provide 6.65ha.

4.5.4 The cemeteries include:

- All Saints' Church Cemetery, Frindsbury – 0.79ha;
- All Saints' Church, Frindsbury – 1.04ha;
- New Testiment Church of God – 0.26ha;
- St Francis of Assisi Church – 0.31ha.

All Saints Parish Hall



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Community Centre
- Place of Worship
- Library
- Cemeteries

4.0 Social Infrastructure

4.7 Convenience Retail

Convenience Stores

4.7.1 The nearest convenience store to the site is the Tesco Esso Express, located at a petrol station, offering a limited range of goods. The store is approximately 0.5km from the site, amounting to an approximate 3 minute walk. There are few other convenience stores located within appropriate walking distance of the site, of which are limited in size.

4.7.2 According to the SHENA Retail and Commercial Leisure Assessment, there are three larger food stores within Strood district centre, two of which are stronger performing, operated by Morrisons and Tesco.

4.7.8 The Morrisons store in particular is large and modern with a wide range of fresh food counters, whilst the Tesco store is rather dated, with a limited but reasonable product range devoted almost wholly to convenience goods.

4.7.9 The Retail and Commercial Assessment cites that Strood district centre is struggling for viability and vitality more than other areas in Medway. However, any proposals for a new convenience store would need to be informed by a retail impact assessment, regardless of size.

Tesco Superstore

Morrisons

Pubs and Restaurants

4.7.10 The closest pub to the site is The Coach & Horses, which is located approximately 1.3km south of the site, amounting to an approximate 17 minute walk.

4.7.11 Other pubs located within an approximate 20 minute walk from the site include The Ship and the Weston Arms.

4.7.12 The nearest restaurant to the site, which is located 1km southwest from the site which is an approximate 15 minute walk.

4.7.13 Other takeaways in the surrounding area include Good Luck Chinese Takeaway, Papa John's, McDonalds, Domino's and Cobham Inn

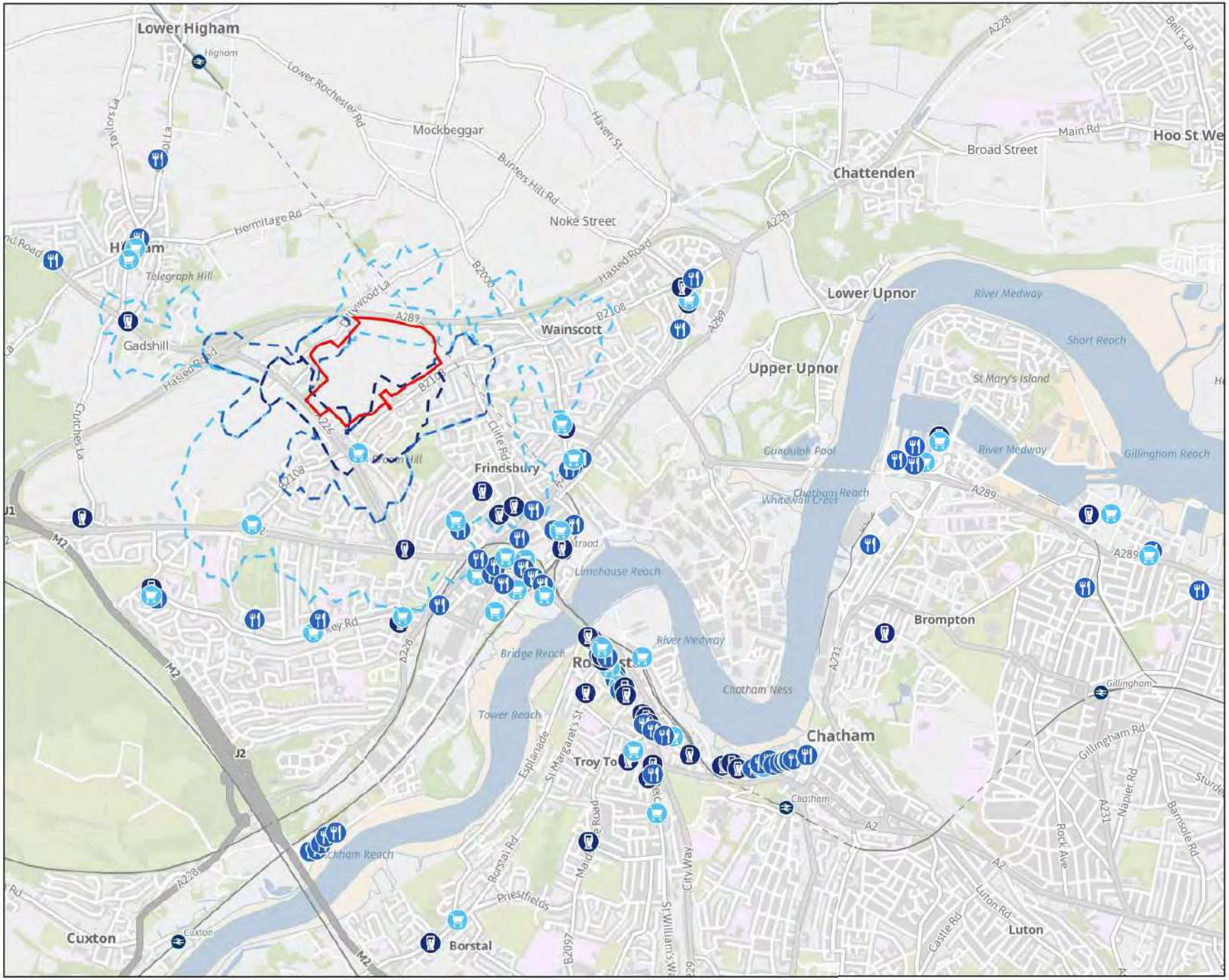
The Coach & Horses

Summary

4.7.14 Overall, a convenience store as part of the proposed development would be ideally located to serve the c. 800 dwellings, and surrounding areas, however this would need to be informed by a retail impact assessment.

4.7.15 Strood appears to be plentiful in pubs and restaurants, and it is unlikely that a new pub or restaurant will be required, especially with other infrastructure being more in demand.

Papa Johns



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Pub
- Restaurant
- Shop

4.0 Social Infrastructure

4.8 Care Homes

4.8.1 There is a national trend of population ageing. With populations of older people growing, there is an increasing need for provision of care homes.

4.8.2 There are eight elderly care homes within a 20 minute walking distance of the site and 14no. assisted living residences within Strood. The majority of which are listed as assisted living residence, whilst others are nursing home and home care service.

4.8.3 The closest of these care homes is Shaws Wood Residential Care Home which is located 1.2km from the site, which is an approximate 18-minute walk from the site. Whilst walking distance is not necessarily a major factor, it does demonstrate that the site is located in an area that is sparser of care homes, compared to other areas of Strood.

4.8.4 Despite 14 assisted living residences being located within Strood, there is a growing need for provision care homes. The data gathered by the Care Quality Commission (CQC) in 2024 shows that there are a total of 1,465 registered beds for older persons, comprising of the following:

- 670 registered residential care beds
- 795 registered nursing care beds

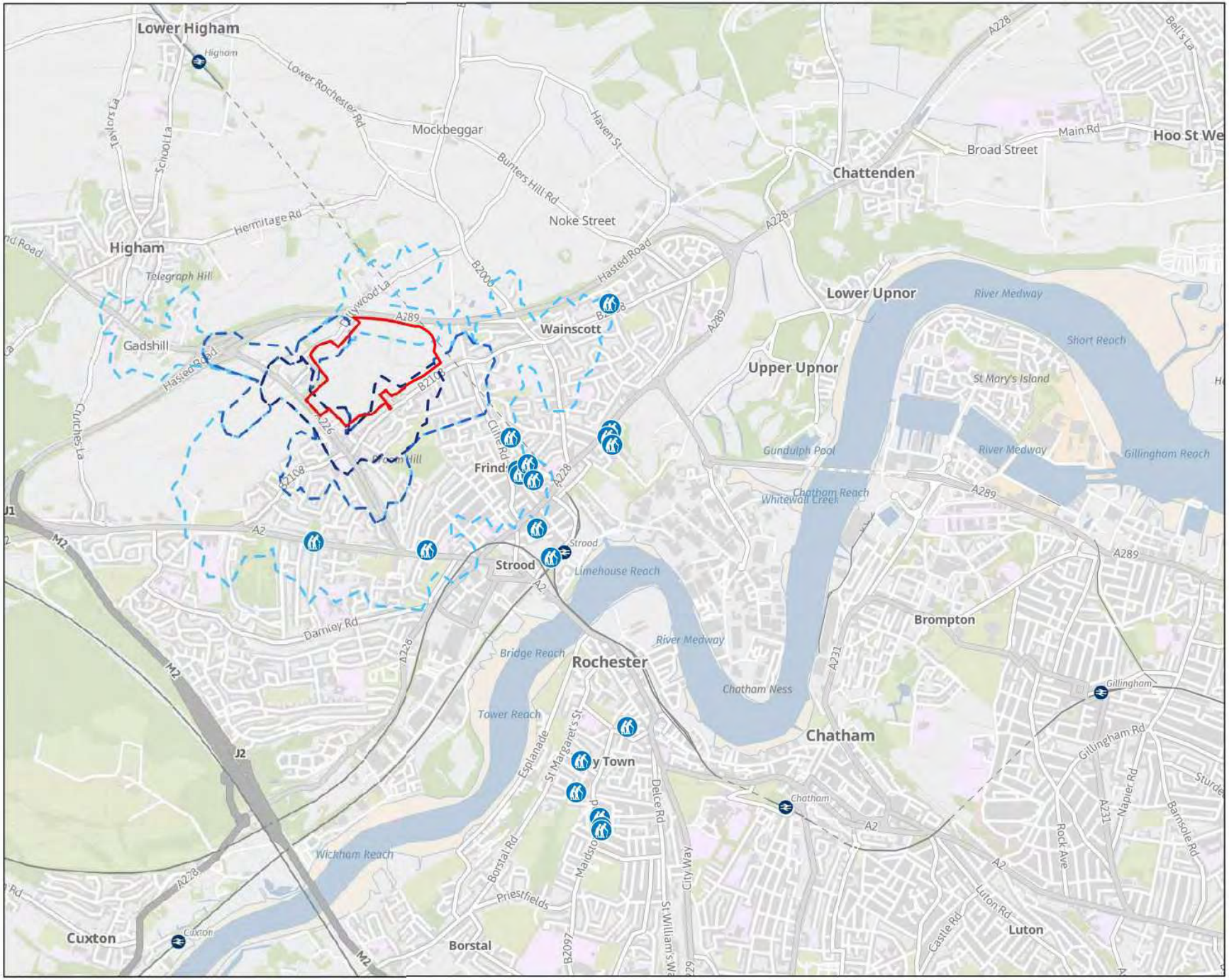
4.8.5 According to the Medway Adult Social Care Local Account 2020/21, by 2025, it is projected that the number of people in Medway aged 65 years and over will increase by 7.1% to 48,400 people, and that the number of people aged 85 years and over will increase by 11.5% to 5,800 people.

4.8.6 The Medway Extra Care Housing Needs Analysis 2011-32 concluded that 'there is clear scope to widen the range of housing and support options available to older people across tenures with the need for specialist housing services to enable the growing number of older people to live independently'.

4.8.7 Evidence to support a growing demand comes from a Needs Assessment, prepared by Carterwood in February 2023 to support a planning application for a 66no. bed care home in Halling (MC/23/0535), which stated that it is anticipated that the gross need for care home beds is expected to rise between 2023 and 2043 by c. 47%. Specialist care homes for those with dementia is also expected to rise.

4.8.8 The Needs Assessment also shows that there is a planned supply of 236 market beds and 76 specialist dementia beds by 2025, however there is no planned supply afterwards.

4.8.9 Overall, there is considerable scope to provide a new care home as part of the proposed development, given the trend of increasing numbers of people aged 65+ years and 85+ years.



Key

- Site Boundary
- Care Homes
- 5 Minute Walk Distance (400m) Fro The Site Access
- 10 Minute Walk Distance (800m) F The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access

4.0 Social Infrastructure

4.9 Other

4.7.1 Other services comprise banks, post offices, veterinary clinics and allotments. The majority of which are located south of the site towards Rochester.

4.7.2 The closest bank is Kent Reliance located approximately 1.7km (22 minute walking distance) south of the site.

4.7.4 The closest veterinary clinic is the Medway City Veterinary Centre located in the Medway City Estate approximately 3km (41 minute walk/ 8 minute drive).

Post Office

4.7.5 There is a total of 4no. post offices in Strood, with additional post offices located in Rochester and Higham.

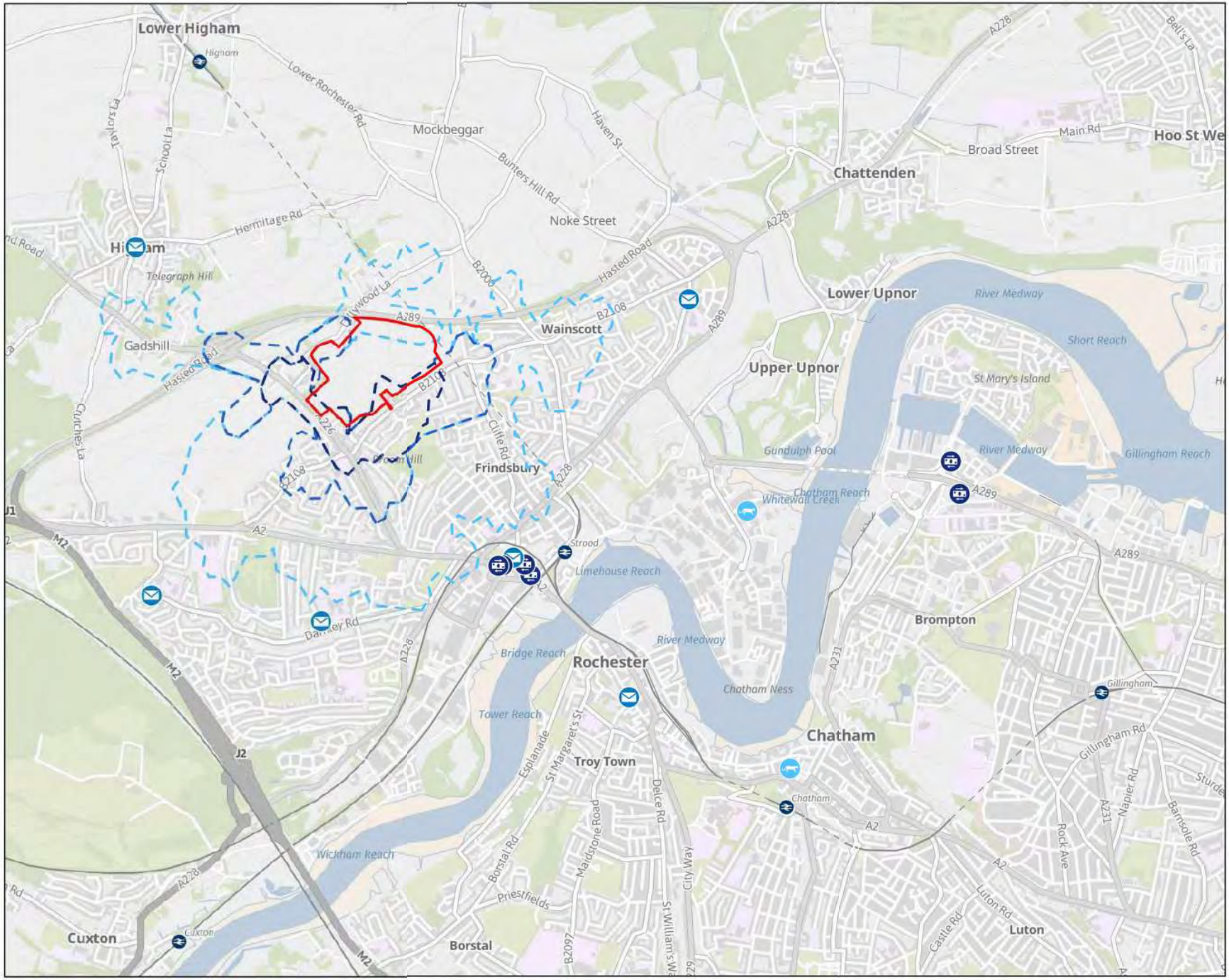
4.7.6 The closest Post Office is The Temple Post Office which is located approximately 1.7km (22 minute walking distance) south of the site.

4.7.7 There are also a number of drop-off locations within Strood, although the closest location to the site is Frindsbury Drop & Collect Post Office, which is approximately 1.6km from the site which equates to an approximate 21 minute walk or a 5 minute drive.

4.7.8 Geographically, the location of a post office as part of the proposed development would not be inappropriate.

Kent Reliance

The Temple Post Office



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Bank
- Post Office
- Vets

5.0 Development

5.1 Development Proposal

5.1.1 The current concept masterplan is for the development of approximately 800 dwellings, a school and a neighbourhood centre containing small retail units and a medical hub.

5.1.2 The latest Illustrative Masterplan is included below:

Illustrative Masterplan
Broomhill Rise, Strood
23020 / SK01C
Scale 1:2000 @ A1 October 2023

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6.0 Conclusion

6.1 Overview

6.1.1 Whilst it is difficult to demonstrate that provision of certain facilities will be appropriate as part of any development at Land north of Brompton Farm without any formal and thorough assessments, this report has studied the supply and demand of various facilities within Medway, and Strood, where the site is more specifically located within Medway.

6.1.2 The following conclusions of note can be made:

- There are conflicting reports about Green Belt Parcel 2, with Medway Council citing high contribution to the purpose of the Green Belt (without providing evidence) and Scarp Landscape suggest a much more limited contribution – an updated Green Belt Assessment is currently being prepared.
- Given the amount of proposed housing, it is likely that a new build school will be required rather than developer contributions, as set out by Medway's School Place Planning Strategy 2018-22. Due to the current capacity of nearby schools this is recommended to be a primary school.
- Despite higher no. of pharmacies per 100,000 than the national average, it is recommended that provision of pharmacies is reviewed should any significant residential developments.
- Geographically, provision of a new GP would alleviate the potential stress that a c.800 dwelling development would bring about, although this would need to be informed by a Needs Assessment and some of the challenges that GPs face in Medway include staffing and increased running costs.
- There is a very high current and future demand for 11v11 grassroots pitches, as well as moderate demand for 11v11 AGP pitches, although the AGP demand could be satisfied by a community use agreement with Strood Academy.
- With the exception of rugby union pitches, the level of demand for playing pitch provision of other sports is generally much lower.
- Regarding indoor sport provision, there is a preference to upgrade and refurbish existing facilities, rather than building new facilities.
- Given Strood's urban nature, the area is generally lagging behind other areas regarding quantity open space, however provision of green space

can be easily achieved.

- Any retail development would have to be informed by a Retail Impact Assessment, however, there does not appear to be a larger food store within close proximity to the site (closest is a Tesco Esso Store at a petrol station), especially when the primary larger food stores are located in the south of Strood.
- Based on the most recent Needs Assessment and other evidence documents, there appears to be a general demand for care home/elderly accommodation provision and incorporation of a care home/elderly accommodation element would be sensible, although a Needs Assessment would be required to be undertaken to determine the present needs.
- There appears to be good provision of childcare facilities and provision of such is likely not a high priority, although a development of c. 800 dwellings will likely increase the pressure on existing facilities.
- The location of a new post office within Brompton Farm as part of any development would not be inappropriate, although there appears to be sufficient childcare facilities (i.e. nurseries) provision within Strood to serve the site.

TRANSPORT TECHNICAL NOTE

JOB REF.
PL/AH/32314

CLIENT
Bellway Homes (Strategic) Ltd.

SITE
Land North of Brompton Farm Road, Strood, Medway

1.1 INTRODUCTION

1.1.1 This Transport Technical Note (TTN) has been prepared in support of representations by Bellway Homes (Strategic) Ltd. to the Medway Local Plan 2040 Regulation 18 consultation in relation to Land North of Brompton Farm Road, in Strood, which is being promoted for residential development.

1.1.2 The current proposals are for the development of approximately c. 800 dwellings, a school and a neighbourhood centre containing small retail units and a medical hub. This TTN outlines the proposed multi-modal access strategy, considers the accessibility of the site, quantifies the likely vehicular trip generation of the development and identifies appropriate and proportionate mitigation measures.

1.2 PROPOSAL SITE

1.2.1 The site is located to the east of the A226 Gravesend Road and to the south of the A289 Hasted Road, approximately 1.9km north-east of Strood and 3.2km north-west of Rochester town centres. The location of the site within a local context is shown in Figure 1 overleaf.

FIGURE 1: SITE LOCATION WITHIN LOCAL CONTEXT (COURTESY OF GOOGLE MAPS)

1.2.2 The site currently comprises agricultural land, with access achieved to the north-west via Dillywood Lane and to the south-east via Strodes Close.

1.2.3 The site is bound to the north by Dillywood Lane and the A289, to the east by agricultural land, Stonehorse Lane and residential dwellings on the B2108 Brompton Farm Road, to the south by residential dwellings on the B2108 Brompton Farm Road, and to the west by dwellings on the A226 Gravesend Road.

1.3 DEVELOPMENT PROPOSALS

1.3.1 The proposals comprise the development of up to 800 residential dwellings, a school and a neighbourhood centre containing small retail units and a medical hub, together with associated access, landscaping and open space. The indicative layout plan is included at **Appendix A**. The locations of the proposed access points can be seen in Figure 2 overleaf, with vehicular access points denoted in red and pedestrian-only access points denoted in yellow. It is noted that pedestrian access will also be achievable via the vehicular access points.

FIGURE 2: PROPOSED SITE ACCESS POINTS (COURTESY OF GOOGLE MAPS)

1.3.2 Two vehicular access points are proposed; with the principal access from the A226 Gravesend Road and a secondary emergency, pedestrian and cycle access from Strodes Close.

1.3.3 An indicative design of the principal access from the A226 Gravesend Road has been prepared and is included at **Appendix B**. Due to the scale of the proposed development, it is considered that this access would need to take the form of a signalised junction. The feasibility design demonstrates how this access could also serve the land to the west of the site, which is being promoted for residential development by Barratt David Wilson (BDW).

1.3.4 The signalised junction would incorporate controlled pedestrian crossings, providing access to the existing bus stop on the western side of Gravesend Road, as well as the potential BDW development.

1.3.5 As part of the proposals, the footway on the northern side of Gravesend Road would be widened and upgraded to a shared footway / cycleway, which would extend south to the junction with the B2108 Brompton Farm Road.

1.3.6 Pedestrian access to the site would be achievable via a total of six access points; four of which are existing Public Rights of Way (PRoW) that would be retained and enhanced. The remaining two pedestrian accesses would be newly constructed, with one located off Dillywood Lane to the north of the site and one off Brompton Farm Road to the south.

1.3.7 The site access and internal layout will give consideration to Local Transport Note 1/20 and Manual for Streets guidance with respect to pedestrian and cycle infrastructure. The layout would include a shared footway/cycleway alongside the spine road.

1.4 PEDESTRIAN AND CYCLE ACCESSIBILITY

1.4.1 An existing footway measuring approximately 2.0m in width is provided along the eastern side of the A226 Gravesend Road, which is subject to street lighting to aid pedestrian movements during the hours of darkness. This footway routes between the Gads Hill Interchange to the north-west to the A226 Gravesend Road / A2 Watling Street junction to the south, from where onward connectivity into Strood town centre is available.

1.4.2 Further footways measuring approximately 2.0m in width are provided on both sides of the B2108 Brompton Farm Road. These footways are also subject to street lighting and provide connectivity towards Wainscott.

1.4.3 It is noted that a formal crossing point is not currently provided on the Brompton Farm Road arm of the A226 / B2108 signalised junction, which would be addressed as part of the proposed development to enhance the pedestrian route into Strood.

1.4.4 As has been noted, there are also a number of PRoW in the vicinity of the site; one of which crosses the site from north-west to south-east. Figure 3 below shows the PRoW network local to the site, which is highlighted in green.

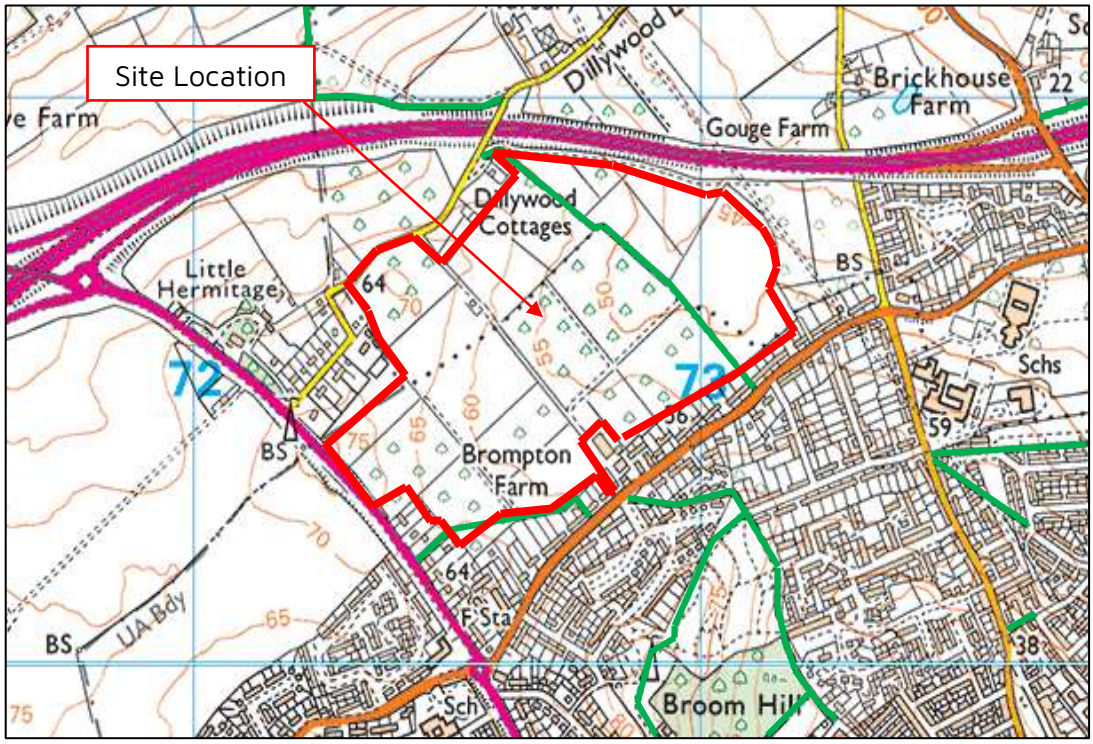

FIGURE 3: PROW NETWORK LOCAL TO THE SITE (COURTESY OF MEDWAY MAPS)

1.4.5 Figure 4 overleaf displays the cycle network local to the site, where local cycle routes are highlighted in blue and National Cycle Routes are highlighted in red.

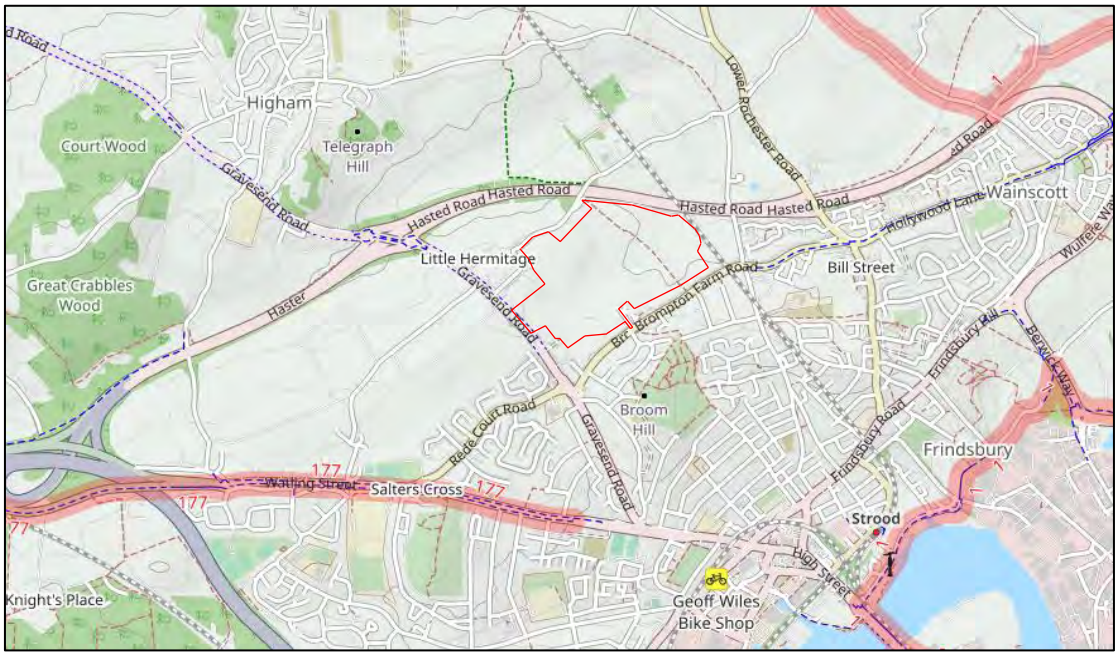

FIGURE 4: CYCLE NETWORK LOCAL TO THE SITE (COURTESY OF OPENCYCLEMAP.ORG)

1.4.6 It is noted that on-carriageway cycle lanes are present on the A226 Gravesend Road, routing north-westwards towards Gravesend. It is further noted that National Cycle Route 177 is accessible from the A2 Watling Street, approximately 1.1km (or a five-minute cycle time) from the proposed principal site access. National Cycle Route 177 routes north-westwards along the A2 to Gravesend and Ebbsfleet.

1.4.7 National Cycle Route 1 is also accessible from Strood and provides onward connectivity throughout the Medway Towns, as well as along the River Thames to Gravesend and Dartford.

1.4.8 As part of the proposed development, improvements would be made to local cycle infrastructure where viable, to seek to contribute to the emerging Medway Local Cycling and Walking Infrastructure Plan (LCWIP). These could include the extension of the existing cycle lanes on Gravesend Road to the junction with Rede Court Road. From this junction, a shared footway / cycleway could provide a link to NCR 177 on the A2.

1.4.9 Isochrone maps have been prepared to show the available services and facilities that are located within a five, ten and twenty minute walking and cycling distance of the site, which are included at **Appendix C**. These demonstrate that there is the opportunity to access many everyday services and facilities from the site by active and sustainable travel modes.

1.5 PUBLIC TRANSPORT ACCESSIBILITY

1.5.1 A pair of bus stops are located on Gravesend Road, approximately 130m (or a one-to-two minute walk) from the proposed principal vehicular access. A further pair of bus stops are present on Brompton Farm Road approximately 42m (or a one-minute walk) from the proposed secondary access.

1.5.2 These stops are provided with flags and posts and are accessible via the aforementioned footway infrastructure from the proposed site accesses. Tables 1 and 2 below list the bus routes that are available from these stops, along with the service frequencies.

SERVICE NO.	ROUTE	SERVICE FREQUENCY		
		Weekday	Saturday	Sunday
190	Gravesend - Chatham	2 – 3 per hour	2 – 3 per hour	1 per hour
668	Chalk – Grammar Schools	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

TABLE 1: BUS SERVICES AVAILABLE ON GRAVESEND ROAD

SERVICE NO.	ROUTE	SERVICE FREQUENCY		
		Weekday	Saturday	Sunday
172	Wainscott – Strood - Chatham	3 per day	No service	No service
633	Cliffe – Grammar Schools	School service	No Service	No service
673	Cuxton – Hoo Academy	School service	No service	No service
689	Darnley Arch – Hundred of Hoo Academy	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

TABLE 2: BUS SERVICES AVAILABLE ON BROMPTON FARM ROAD

1.5.3 As part of the proposed development, these bus stops would be provided with sheltered waiting facilities and as has been noted, a controlled pedestrian crossing and footway will be provided to the stop on the western side of Gravesend Road. The potential to provide a new or enhanced bus service through the site between Gravesend Road and Brompton Farm Road would also be explored.

1.5.4 The nearest railway station to the site is Strood, which is located approximately 2.0km (representing a 26-minute walk or a nine-minute cycle) from the proposed secondary site access on Strodes Close. This station is afforded disabled parking, step-free access and cycle storage in the form of covered Sheffield stands for 40 cycles. Table 3 below lists the direct train services that are available from this station along with their weekday and weekend frequencies.

SERVICE	SERVICE FREQUENCY		
	Weekday	Saturdays	Sundays
Luton via London Blackfriars	2 per hour	2 per hour	No direct service
Ramsgate	1 per hour	1 per hour	1 per hour
Rainham	4 per hour	3 per hour	3 per hour
Paddock Wood	2 per hour	2 per hour	1 per hour
London St Pancras International	4 per hour	3 per hour	3 per hour

TABLE 3: TRAIN SERVICE AVAILABILITY AND FREQUENCY FROM STROOD RAILWAY STATION

1.6 SITE ACCESSIBILITY

1.6.1 A number of existing services and facilities are available within Strood to the south-east of the proposal site, which can be accessed via the aforementioned pedestrian and cycle routes. These facilities include a café, takeaways, convenience stores, a primary school, a GP surgery, a pharmacy and a post office. Table 4 overleaf lists a selection of these services and facilities along with their approximate distances and walking and cycling times from the proposed primary access point off the A226 Gravesend Road.

FACILITIY / SERVICE	DISTANCE	TIME	
		WALKING	CYCLING
Petrol Station – Esso	450m	6 minutes	1 minute
Convenience Store – Tesco Express	450m	6 minutes	1 minute
Dentist – Louise Lunness-Barnes Dental Clinic	800m	10 minutes	3 minutes
Secondary School – Strood Academy	1,500m	19 minutes	6 minutes
Primary School – Temple Mill	1,700m	21 minutes	5 minutes
Takeaway – Mayas Pizza	1,700m	21 minutes	6 minutes
Pharmacy – Bryant Road Pharmacy	1,700m	21 minutes	5 minutes
Public House – The Stone Horse	1,700m	16 minutes	5 minutes
GP – Apex Medical Practice	1,900m	24 minutes	5 minutes
Café – Friends Cafe	1,900m	24 minutes	6 minutes
Supermarket – Aldi	2,000m	25 minutes	6 minutes
Nursery – St Marys Day Nursery	2,100m	28 minutes	7 minutes
Gym – The Gym Group	2,100m	26 minutes	7 minutes
Post Office – Lower Stoke Post Office	2,200m	28 minutes	6 minutes

TABLE 4: FACILITIES AND SERVICES LOCAL TO PROPOSAL SITE

1.6.2 The walk times provided above are based on a walk speed of 80m per minute, a figure which is widely used to estimate walk times and used within the London-based Public Transport Accessibility Level (PTAL) analysis. It aims to provide a typical average value that estimates it takes five minutes to walk 400m, ten minutes to walk 800m and so on.

1.6.3 The cycle times provided above are based on those provided by the Google Maps tool, which assumes a standard moving speed of 16km per hour for cyclists and takes into account such elements as elevation change and number of junctions crossed on a given route.

1.7 TRIP GENERATION ASSESSMENT

1.7.1 The vehicle trip generation of the proposed development has been forecast with reference to the national TRICS trip rate database. To ensure a robust initial assessment of the site, surveys in the category '*03 – RESIDENTIAL, A – HOUSES PRIVATELY OWNED*' have been selected. Survey sites outside of Greater London within England, Scotland and Wales have been considered in 'Suburban' and 'Edge of Town' locations and the population criteria refined to reflect the location of the proposal site. It is noted that all surveys that took place during the period of Covid-19 travel restrictions have been excluded from this activity. The resulting average TRICS trip rates are shown in Table 5 below. The full TRICS report is included at **Appendix D**.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
08:00 – 09:00	0.145	0.371	0.516
17:00 – 18:00	0.341	0.166	0.507
07:00 – 19:00	2.222	2.228	4.450

TABLE 5: TRICS TRIP RATES – HOUSES PRIVATELY OWNED (TRIPS/DWELLING)

1.7.2 These trip rates have subsequently been factored by the c.800 dwellings proposed to provide the forecast vehicle trip generation in Table 6 below. Please note that any inaccuracies are the result of rounding in MS Excel.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
08:00 – 09:00	116	297	413
17:00 – 18:00	273	133	406
07:00 – 19:00	1,778	1,782	3,560

TABLE 6: TRIP GENERATION – HOUSES PRIVATELY OWNED (800 DWELLINGS)

1.7.3 It is noted that the site could generate up to 413 vehicle trips during the weekday AM peak hour and 406 vehicle trips during the PM peak hour, with a total of 3,560 trips across the twelve-hour working day (07:00-19:00). This equates to 297 vehicle trips per hour on average, or approximately five per minute.

1.7.4 Whilst there are also non-residential uses proposed, it is anticipated that the majority of trips attracted to them would be internal to the site.

1.7.5 It is further noted that the above assessment can be considered robust due to the use of pre-Covid-19 pandemic trip rates, which do not account for the lower commuting rate of residents post-pandemic, and it has been assumed that 100% of the residential dwellings will be privately owned, thereby resulting in a higher trip rate.

1.7.6 As well as the robustness of this assessment, it is reiterated that the site would be afforded access to high quality pedestrian, cycle and public transport infrastructure both internally and connecting to off-site services and facilities, enabling residents to utilise modes of transport other than the private vehicle. The potential on-site primary school and neighbourhood centre would also facilitate the internalisation of many everyday journeys and a site-wide Travel Plan would include both 'soft' and 'hard' interventions to incentivise the use of active and sustainable travel modes.

1.8 TRIP DISTRIBUTION AND ASSIGNMENT

1.8.1 A vehicular trip distribution and assignment exercise has been completed using '*Location of usual residence and place of work by method of travel to work*' data from the 2011 Census for Middle-Layer Super Output Area (MSOA) 'Medway 005', in which the majority of the site is located, including the proposed principal vehicular access.

1.8.2 It is noted that whilst equivalent data from the 2021 Census has subsequently been released, this was obtained during the Covid-19 pandemic when travel demand was suppressed. The 2011 data has therefore been used in the interest of robustness.

1.8.3 On this basis, the total vehicular trip generation set out in Table 6 has been distributed and assigned to the local highway network as summarised in Table 7 overleaf.

JUNCTION	% DISTRIBUTION	AM PEAK HOUR	PM PEAK HOUR
A226 Gravesend Rd / Site Access	100%	413	406
A226 Gravesend Rd / A289 Hasted Rd / Gravesend Rd ('Gads Hill Interchange')	69%	286	281
M2 Junction 1	53%	217	213
A226 Gravesend Rd / B2108 Brompton Farm Rd / B2108	31%	127	124
A2 / A226 Gravesend Rd	15%	61	60
A2 / Station Rd	12%	51	50
A2 / B2108	5%	19	19

TABLE 7: VEHICLE TRIP DISTRIBUTION

1.8.4 It is noted that the maximum increase at any one junction would be at the Gads Hill Interchange to the north-west of the site, with an increase of 286 vehicle movements during the weekday AM peak hour and 281 vehicle movements during the PM peak hour. This equates to approximately four-to-five vehicle movements per minute at these times, which as noted above represents a highly robust assessment. The impact at other junctions in the study area is much reduced, as vehicles would readily dissipate across the local highway network.

1.8.5 As part of any forthcoming planning application, a full Transport Assessment (TA) would be prepared, informed by the Medway AIMSUN Model (MAM), which would consider the highway capacity impacts of the proposed development in combination with other local committed and allocated developments on the local and strategic highway networks. Proportionate contributions to off-site highway mitigation measures identified through the Local Plan process would be made where necessary, with an emphasis on highway safety improvements and enhancements to sustainable and active travel infrastructure, in line with the principles of Department for Transport Circular 01/2022.

1.9 TRANSPORT STRATEGY

1.9.1 The proposed development would be subject to a Framework Travel Plan; a draft of which would accompany a forthcoming planning application. This would give consideration to the ongoing changes in travel behaviours which were hastened by the Covid-19 pandemic, as well as potential 'soft' and 'hard' interventions to lock-in this shift away from peak period vehicle use, in accordance with the

overarching sustainability objective of the emerging Local Plan. These could include financial incentives to encourage the uptake of walking, cycling, public transport and car clubs, as well as home shopping services, and the implementation of facilities to promote home-based and flexible working patterns. As has been noted, there is also the potential to route a new or enhanced bus service through the site between Gravesend Road and Brompton Farm Road.

1.9.2 The implementation of cycle to work schemes by both employers and local authorities has achieved an increase in the number of people who are opting to cycle either their full commute or part of it. This will be facilitated by the provision of secure cycle storage facilities for every dwelling and enhanced cycle infrastructure both within the site and externally, in support of the emerging Medway LCWIP. The potential on-site primary school will also benefit from the implementation of 'school streets' in the vicinity, to ensure that pupils and parents have the opportunity to walk and cycle in safety on a daily basis.

1.9.3 The design of the internal site layout is also critical to the uptake of active and sustainable travel modes and to trip internalisation. To this end, the street network will prioritise non-car modes at every opportunity, with wide, direct, landscaped and well-surveillanced walking and cycling routes provided along principal route corridors and shared surfaces and 'home zones' within lightly trafficked areas. The existing PRoW that cross the site will also be maintained and enhanced to promote walking for leisure.

1.9.4 Where the use of a car remains necessary, the increased uptake of electric and low-emission vehicles will progressively reduce their environmental impact, and these will be promoted through the installation of 'active' charging infrastructure for every dwelling. The potential to introduce an on-site car club will also be explored to seek to reduce car ownership and parking demand.

1.10 SUMMARY AND CONCLUSION

1.10.1 This Transport Technical Note has been prepared in support of representations by Bellway Homes (Strategic) Ltd. to the Medway Local Plan 2040 Regulation 18 consultation in relation to Land North of Brompton Farm Road, in Strood, which is being promoted for residential development.

1.10.2 The proposals comprise the development of c. 800 residential dwellings, a school and a neighbourhood centre consisting of small retail units and a medical hub, together with associated access, landscaping and open space.

1.10.3 Primary vehicular access to the site would be achieved via a signalised junction on the A226 Gravesend Road, with a secondary pedestrian, cycle, emergency and potential bus-only access proposed from Strodes Close. A total of six pedestrian accesses are proposed; four of which are associated with existing Public Rights of Way that would be retained as part of the development.

1.10.4 A review of the existing local pedestrian, cycle and public transport infrastructure has demonstrated that the site is afforded the opportunity for many everyday

journeys to take place by active and sustainable travel modes, with a range of local services and facilities located within a reasonable walking and cycling distance. Enhancements to this infrastructure would be made as part of the proposed development, in support of the emerging Medway Local Cycling and Walking Infrastructure Plan, and the potential on-site primary school and neighbourhood centre would further enhance non-car accessibility.

1.10.5 An initial trip generation assessment has been completed for the proposals, which indicates that up to 413 vehicle movements could be generated in the weekday AM peak hour and 406 in the PM peak hour. Across the twelve-hour working day (07:00-19:00), approximately 297 vehicle movements per hour are forecast.

1.10.6 These vehicle trips have been distributed and assigned to the local highway network using 2011 Census data, which demonstrates that they would readily dissipate away from the site. As part of any forthcoming planning application, a full Transport Assessment would be prepared, which would consider the highway capacity impacts of the proposed development in combination with other local committed and allocated developments on the local and strategic highway networks. Proportionate contributions to off-site highway mitigation measures identified through the Local Plan process would be made where necessary, with an emphasis on highway safety improvements and enhancements to sustainable and active travel infrastructure.

1.10.7 In summary, it has been demonstrated that the site represents a viable and sustainable location for development in transport planning terms.

APPENDIX
A

N
W E
S

0 20m 40m 60m 80m

KEY

- Vehicular and pedestrian access
- Pedestrian access only
- Existing Public Right of Way
- Trim Trail
- Residential development parcels
- Footpath/cycle links
- Play areas
- Wildflower meadows
- Mown paths
- Viewing area
- Community orchard
- Community allotments
- SuDS features
- Neighbourhood centre
- School site
- School playing fields

Illustrative Masterplan
Broomhill Rise, Strood

23020 / SK01C

Scale 1:2000 @ A1 October 2023

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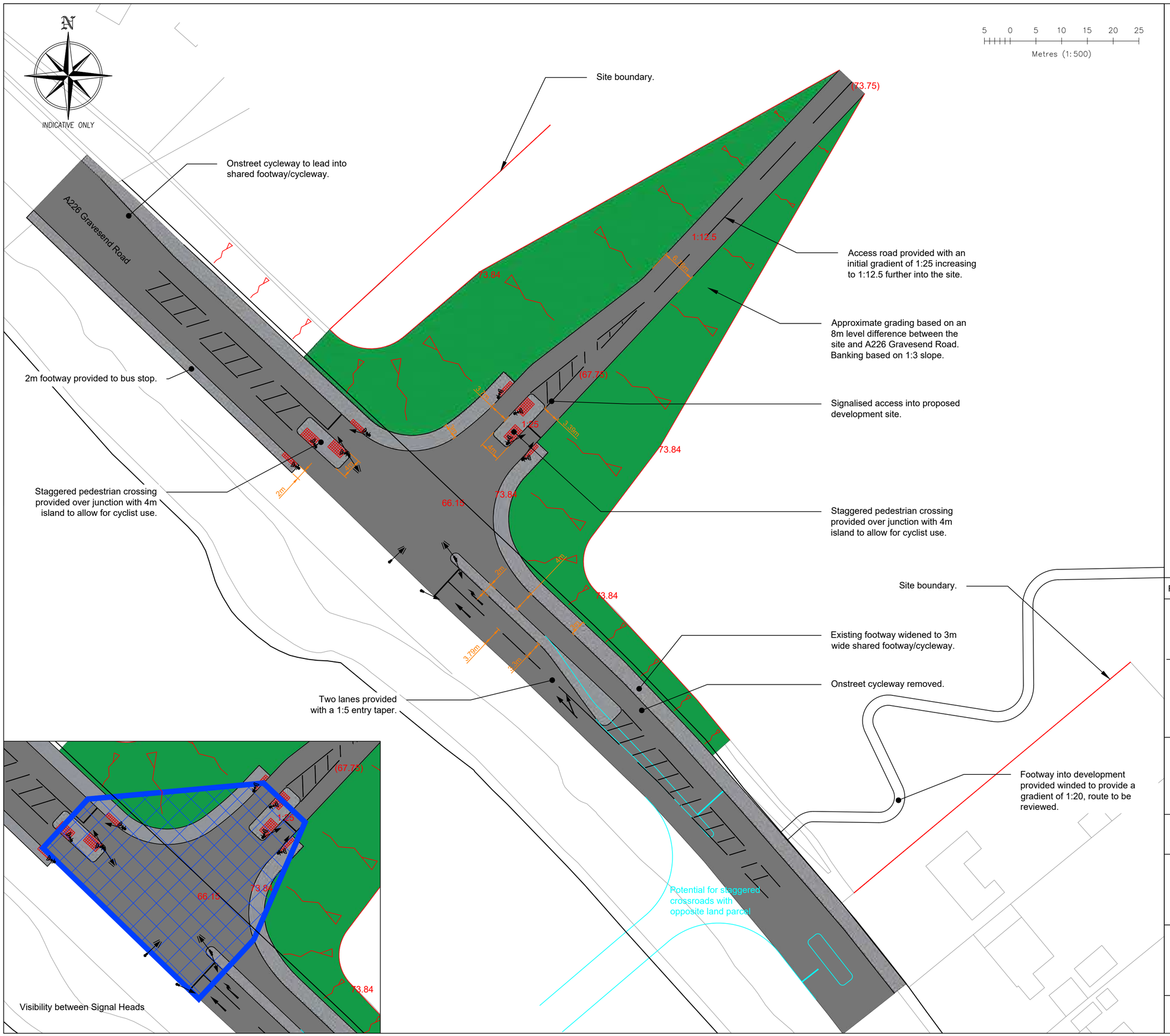
OSP Architecture, Broadmede House, Farnham Business Park, Weydon Lane, Farnham, Surrey, GU9 8QT Tel: 01252 267878
www.osparchitecture.com

APPENDIX
B


N
INDICATIVE ONLY
5 0 5 10 15 20 25
Metres (1:500)
Site boundary.
Onstreet cycleway to lead into shared footway/cycleway.
A226 Gravesend Road
2m footway provided to bus stop.
Staggered pedestrian crossing provided over junction with 4m island to allow for cyclist use.
Two lanes provided with a 1:5 entry taper.
Access road provided with an initial gradient of 1:25 increasing to 1:12.5 further into the site.
Approximate grading based on an 8m level difference between the site and A226 Gravesend Road. Banking based on 1:3 slope.
Signalised access into proposed development site.
Staggered pedestrian crossing provided over junction with 4m island to allow for cyclist use.
Existing footway widened to 3m wide shared footway/cycleway.
Onstreet cycleway removed.
Footway into development provided winded to provide a gradient of 1:20, route to be reviewed.
Site boundary.
Potential for staggered crossroads with opposite land parcel
(73.75)
73.84
(67.75)
66.15
1:12.5
1:25
4.10m
3.39m
3.79m
2.38m
2m
4m
Visibility between Signal Heads

Notes:

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- Drawing is subject to topographical survey and a stage 1 road safety audit.
- Levels shown are indicative based on lidar data

Extent of Highway Maintained Land

REV	AMENDMENTS	DATE	CHK
P1	First issue	24.10.23	CS

Client

BELLWAY HOMES LTD (KENT DIVISION)

Project

LAND NORTH OF BROMPTON FARM ROAD, STROOD

Title

PROPOSED ACCESS ARRANGEMENT

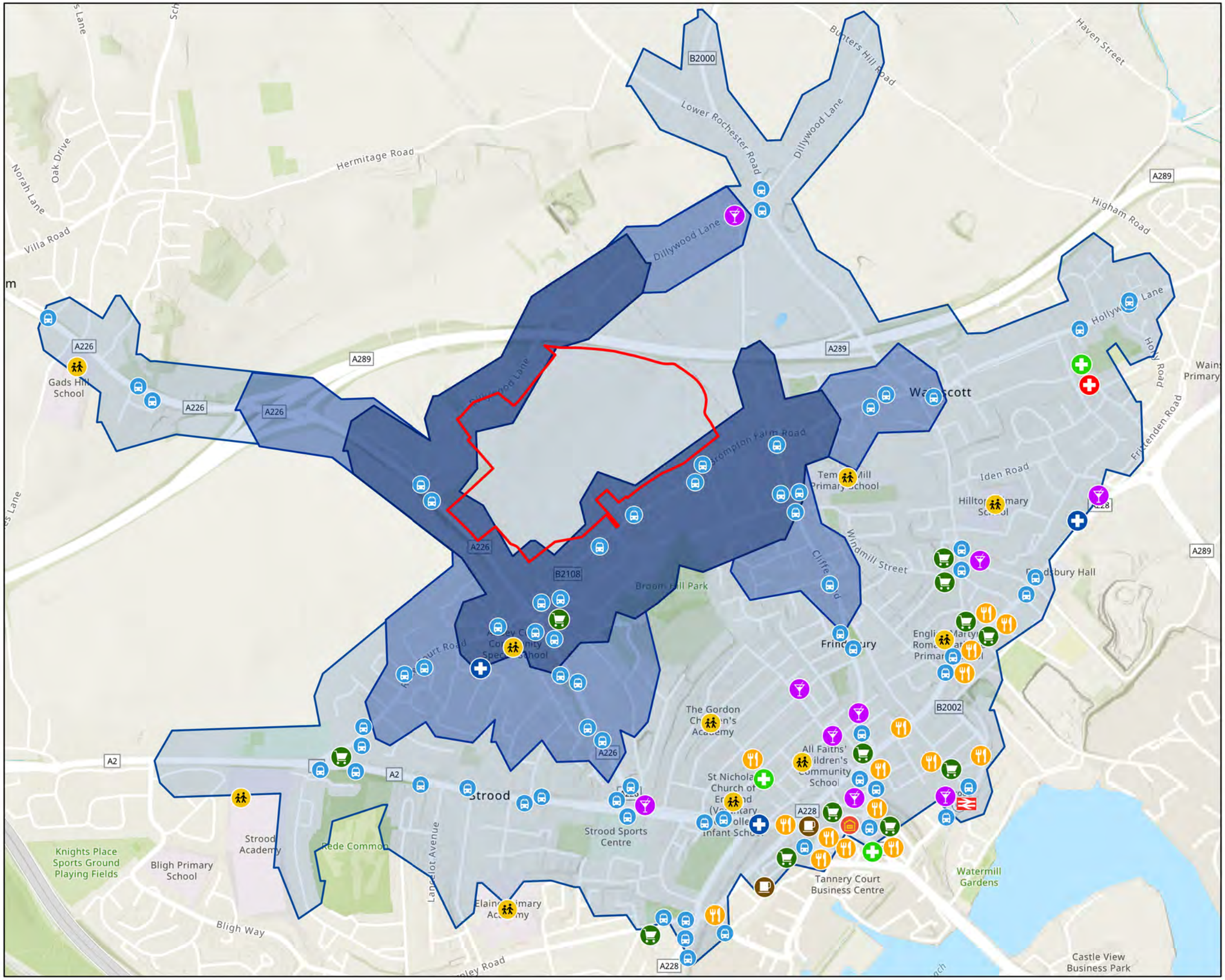
Drwg	Rev	Scale	Date
32314-H-01	P1	1:500	24.10.23

Eclipse House, Eclipse Park. Sittingbourne Road
Maidstone, Kent. ME14 3EN
t: 01622 776226 f: 01622 776227
e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

CAD Reference:

A2

APPENDIX
C



Key

- Site Location
- 5 Minute Walk From The Site Accesses
- 10 Minute Walk From The Site Accesses
- 20 Minute Walk From The Site Accesses
- Schools
- Dentist Surgeries
- Pharmacies
- GP Surgeries
- Grocery Store
- Cafe
- Pubs
- Resturant
- Post Office
- Train Station
- Bus Stops

TITLE

Facilities within walking distance of the site

CLIENT

Bellway Homes

PROJECT

Brompton Farm Road, Strood

SCALE AT A3	DATE	JOB NO.	DRWG NO.
1:12,500	Oct 2023	32314	G-01

Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

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0 0.38 0.75 1.5 Kilometers

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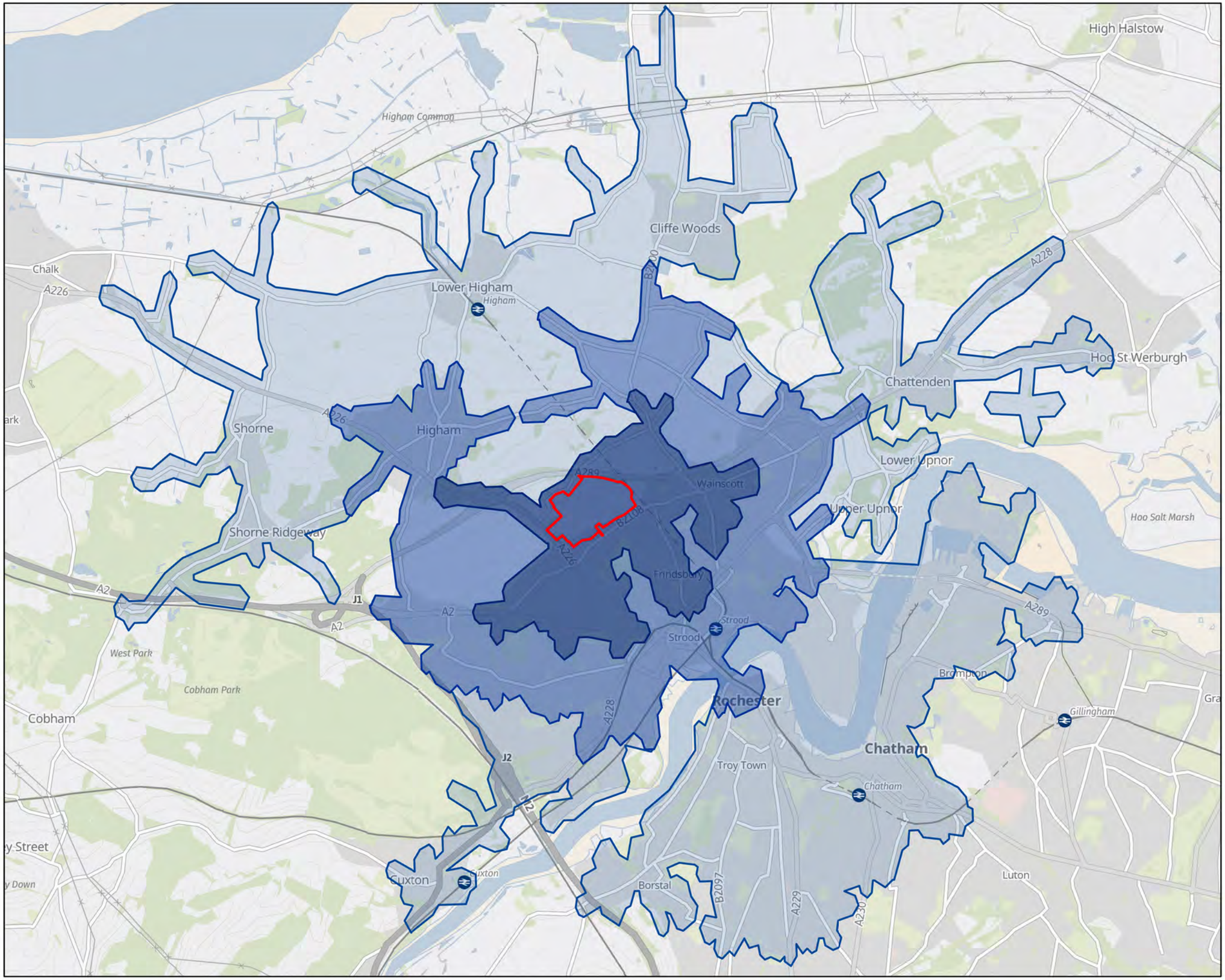
World Hillshade: Esri, Intermap, NASA, NGA, USGS. Contains public sector information licensed under the Open Government Licence v3.0.



Key

- Site Location
- 5 Minute Cycle From The Site Accesses
- 10 Minute Cycle From The Site Accesses
- 20 Minute Cycle From The Site Accesses

0 1 2 4 Kilometers

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TITLE

Cycling distance from the site

CLIENT

Bellway Homes

PROJECT

Brompton Farm Road, Strood

SCALE AT A3	DATE	JOB NO.	DRWG NO.
1:38,000	**Oct 2023**	**32314**	**G-02**

Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

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APPENDIX
D

Calculation Reference: AUDIT-704001-231002-1009

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST		
	ES	EAST SUSSEX	2 days
	HC	HAMPSHIRE	2 days
	HF	HERTFORDSHIRE	1 days
	KC	KENT	3 days
	SC	SURREY	2 days
	WB	WEST BERKSHIRE	1 days
	WS	WEST SUSSEX	3 days
04	EAST ANGLIA		
	CA	CAMBRIDGESHIRE	1 days
	NF	NORFOLK	10 days
05	EAST MIDLANDS		
	DY	DERBY	1 days
06	WEST MIDLANDS		
	ST	STAFFORDSHIRE	1 days
11	SCOTLAND		
	AS	ABERDEENSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
Actual Range: 105 to 537 (units:)
Range Selected by User: 100 to 600 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/15 to 29/06/23

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	8 days
Wednesday	10 days
Thursday	5 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	23 days
Directional ATC Count	5 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Edge of Town	22
Neighbourhood Centre (PPS6 Local Centre)	6

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	22
Village	5
Out of Town	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	10 days - Selected
Servicing vehicles Excluded	63 days - Selected

Secondary Filtering selection:

Use Class:

C3	28 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:
All Surveys Included

Secondary Filtering selection (Cont.):

Population within 1 mile:

1,001 to 5,000	8 days
5,001 to 10,000	9 days
10,001 to 15,000	7 days
15,001 to 20,000	2 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	7 days
25,001 to 50,000	6 days
50,001 to 75,000	3 days
75,001 to 100,000	3 days
100,001 to 125,000	1 days
125,001 to 250,000	8 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	21 days
1.6 to 2.0	4 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	21 days
No	7 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	28 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 AS-03-A-02 MIXED HOUSES ABERDEENSHIRE
FARROCHIE ROAD
STONEHAVEN

Edge of Town
Residential Zone
Total No of Dwellings: 131
Survey date: WEDNESDAY *20/04/22* *Survey Type: MANUAL*

2 CA-03-A-06 MIXED HOUSES CAMBRIDGESHIRE
CRAFT'S WAY
NEAR CAMBRIDGE
BAR HILL
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 207
Survey date: FRIDAY *22/06/18* *Survey Type: MANUAL*

3 DY-03-A-01 MIXED HOUSES DERBY
RADBOURNE LANE
DERBY

Edge of Town
Residential Zone
Total No of Dwellings: 371
Survey date: TUESDAY *10/07/18* *Survey Type: MANUAL*

4 ES-03-A-03 MIXED HOUSES & FLATS EAST SUSSEX
SHEPHAM LANE
POLEGATE

Edge of Town
Residential Zone
Total No of Dwellings: 212
Survey date: MONDAY *11/07/16* *Survey Type: MANUAL*

5 ES-03-A-08 MIXED HOUSES & FLATS EAST SUSSEX
WRESTWOOD ROAD
BEXHILL

Edge of Town
Residential Zone
Total No of Dwellings: 110
Survey date: WEDNESDAY *12/10/22* *Survey Type: MANUAL*

6 HC-03-A-29 MIXED HOUSES & FLATS HAMPSHIRE
CROW LANE
RINGWOOD
CROW
Edge of Town
Residential Zone
Total No of Dwellings: 195
Survey date: THURSDAY *30/06/22* *Survey Type: MANUAL*

7 HC-03-A-32 MIXED HOUSES & FLATS HAMPSHIRE
GREEN LANE
FARNHAM
WEYBOURNE
Neighbourhood Centre (PPS6 Local Centre)
Residential Zone
Total No of Dwellings: 105
Survey date: THURSDAY *29/06/23* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

8 HF-03-A-03 MIXED HOUSES HERTFORDSHIRE
HARE STREET ROAD
BUNTINGFORD

Edge of Town
Residential Zone
Total No of Dwellings: 160
Survey date: MONDAY *08/07/19* *Survey Type: MANUAL*

9 KC-03-A-07 MIXED HOUSES KENT
RECULVER ROAD
HERNE BAY

Edge of Town
Residential Zone
Total No of Dwellings: 288
Survey date: WEDNESDAY *27/09/17* *Survey Type: MANUAL*

10 KC-03-A-08 MIXED HOUSES KENT
MAIDSTONE ROAD
CHARING

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 159
Survey date: TUESDAY *22/05/18* *Survey Type: MANUAL*

11 KC-03-A-10 MIXED HOUSES KENT
HEADCORN ROAD
STAPLEHURST

Edge of Town
Residential Zone
Total No of Dwellings: 106
Survey date: TUESDAY *09/05/23* *Survey Type: MANUAL*

12 NF-03-A-16 MIXED HOUSES & FLATS NORFOLK
NORWICH COMMON
WYMONDHAM

Edge of Town
Residential Zone
Total No of Dwellings: 138
Survey date: TUESDAY *20/10/15* *Survey Type: DIRECTIONAL ATC COUNT*

13 NF-03-A-23 MIXED HOUSES & FLATS NORFOLK
SILFIELD ROAD
WYMONDHAM

Edge of Town
Out of Town
Total No of Dwellings: 514
Survey date: WEDNESDAY *22/09/21* *Survey Type: MANUAL*

14 NF-03-A-31 MIXED HOUSES NORFOLK
BRANDON ROAD
SWAFFHAM

Edge of Town
Residential Zone
Total No of Dwellings: 321
Survey date: THURSDAY *22/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

15 NF-03-A-32 MIXED HOUSES & FLATS NORFOLK
HUNSTANTON ROAD
HUNSTANTON

Edge of Town
Residential Zone
Total No of Dwellings: 164
Survey date: WEDNESDAY *21/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

LIST OF SITES relevant to selection parameters (Cont.)

16 NF-03-A-33 MIXED HOUSES NORFOLK
LONDON ROAD
ATTLEBOROUGH

Edge of Town
Residential Zone
Total No of Dwellings: 143
Survey date: THURSDAY *29/09/22* *Survey Type: MANUAL*

17 NF-03-A-35 MIXED HOUSES & FLATS NORFOLK
REPTON AVENUE
NORWICH

Edge of Town
Residential Zone
Total No of Dwellings: 116
Survey date: WEDNESDAY *28/09/22* *Survey Type: MANUAL*

18 NF-03-A-38 MIXED HOUSES NORFOLK
BEAUFORT WAY
GREAT YARMOUTH
BRADWELL
Edge of Town
Residential Zone
Total No of Dwellings: 537
Survey date: TUESDAY *20/09/22* *Survey Type: MANUAL*

19 NF-03-A-39 MIXED HOUSES NORFOLK
HEATH DRIVE
HOLT

Edge of Town
Residential Zone
Total No of Dwellings: 212
Survey date: TUESDAY *27/09/22* *Survey Type: MANUAL*

20 NF-03-A-44 MIXED HOUSES NORFOLK
MILL LANE
NEAR NORWICH
HORSFORD
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 125
Survey date: WEDNESDAY *21/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

21 NF-03-A-47 MIXED HOUSES & FLATS NORFOLK
BURGH ROAD
AYLSHAM

Edge of Town
Residential Zone
Total No of Dwellings: 300
Survey date: WEDNESDAY *21/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

22 SC-03-A-05 MIXED HOUSES SURREY
REIGATE ROAD
HORLEY

Edge of Town
Residential Zone
Total No of Dwellings: 207
Survey date: MONDAY *01/04/19* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

23 SC-03-A-09 MIXED HOUSES & FLATS SURREY
AMLETS LANE
CRANLEIGH

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 136
Survey date: TUESDAY *24/05/22* *Survey Type: MANUAL*

24 ST-03-A-07 DETACHED & SEMI-DETACHED STAFFORDSHIRE
BEACONSIDE
STAFFORD
MARSTON GATE
Edge of Town
Residential Zone
Total No of Dwellings: 248
Survey date: WEDNESDAY *22/11/17* *Survey Type: MANUAL*

25 WB-03-A-03 MIXED HOUSES WEST BERKSHIRE
DORKING WAY
READING
CALCOT
Edge of Town
Residential Zone
Total No of Dwellings: 108
Survey date: FRIDAY *09/09/22* *Survey Type: MANUAL*

26 WS-03-A-08 MIXED HOUSES WEST SUSSEX
ROUNDSTONE LANE
ANGMERING

Edge of Town
Residential Zone
Total No of Dwellings: 180
Survey date: THURSDAY *19/04/18* *Survey Type: MANUAL*

27 WS-03-A-14 MIXED HOUSES WEST SUSSEX
TODDINGTON LANE
LITTLEHAMPTON
WICK
Edge of Town
Residential Zone
Total No of Dwellings: 117
Survey date: WEDNESDAY *20/10/21* *Survey Type: MANUAL*

28 WS-03-A-15 MIXED HOUSES WEST SUSSEX
HILLAND ROAD
BILLINGSHURST

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 380
Survey date: TUESDAY *23/11/21* *Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
HC-03-A-26	COVID
SF-03-A-10	COVID
WS-03-A-12	COVID
WS-03-A-13	COVID

MANUALLY DESELECTED SURVEYS

Site Ref	Survey Date	Reason for Deselection
DH-03-A-02	27/03/17	n/a
HC-03-A-28	08/11/21	n/a
KC-03-A-04	22/09/17	n/a
WS-03-A-18	15/05/23	n/a

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES			TOTALS		
Time Range	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	28	214	0.076	28	214	0.302	28	214	0.378
08:00 - 09:00	28	214	0.145	28	214	0.371	28	214	0.516
09:00 - 10:00	28	214	0.133	28	214	0.163	28	214	0.296
10:00 - 11:00	28	214	0.127	28	214	0.142	28	214	0.269
11:00 - 12:00	28	214	0.136	28	214	0.141	28	214	0.277
12:00 - 13:00	28	214	0.153	28	214	0.142	28	214	0.295
13:00 - 14:00	28	214	0.147	28	214	0.142	28	214	0.289
14:00 - 15:00	28	214	0.158	28	214	0.179	28	214	0.337
15:00 - 16:00	28	214	0.255	28	214	0.164	28	214	0.419
16:00 - 17:00	28	214	0.266	28	214	0.161	28	214	0.427
17:00 - 18:00	28	214	0.341	28	214	0.166	28	214	0.507
18:00 - 19:00	28	214	0.285	28	214	0.155	28	214	0.440
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.222			2.228			4.450

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	105 - 537 (units:)
Survey date date range:	01/01/15 - 29/06/23
Number of weekdays (Monday-Friday):	32
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	37
Surveys manually removed from selection:	4

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Change Control.
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KEY

- Masterplan Boundary
- Possible Site Entrance (Vehicular)
- Open Space
- Meadow
- Play Areas
- Green Corridors / Trim Trail
- Swales
- SUDS
- Principal Access Route
- Pedestrian Routes
- Education
- Sports/Playing Fields
- Neighbourhood Centre
- PROW
- Promoted Walking Route
- Existing Trees and Hedgerows
- Woodland
- Orchard

Rev.	Description.	By.	Date.
P02	SUDs colour amended	ZA	29.08.24

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OSG Project No.
23/1442

Project Title.
Land to the North Side of Rede Court Road, Strood, Kent

For Barratt David Wilson Homes

Drawing Description.
Illustrative Masterplan

Scale @ A1.	Date Created.
1:5000	August 2024

Drawn By.	Checked By.	Approved By.
TK	TK	TK

Project No.	Originator.	Volume.	Lvl/Loc.	Type.	Role.	Drawing No.
231442	OSG	XX	XX	DR	A	SK001

Suitability.	Revision.
S0	P02

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- All dimensions, tolerances and references must be verified on site prior to construction and any discrepancies reported back to OSG Architecture Limited prior to the works being commenced.
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Broomhill Rise

Strood, Kent

Contents

Introduction
Vision
Healthy placemaking
The site
Considerations
Opportunities
Concept development
Illustrative masterplan
Illustrative landscape proposals
Landscape & visual context
Effects on Green Belt purposes
Planning appraisal
Summary

Bellway | STRATEGIC LAND

23020 : November 2023.
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Introduction

This vision document has been prepared to support the promotion of Broomhill Rise (Land to the North of Brompton Farm Road, Strood) in response to Medway Council's call for sites 2023. This document has been set out to respond to the key elements of assessment criteria and to identify the sites deliverability, viability and quality credentials.

An initial opportunities and constraints exercise has been undertaken. This has focused on a number of technical considerations, including access and landscape whilst also being mindful of the pattern of development surrounding the site and the importance of safeguarding the individuality and identity of the settlement.

This process has informed the development of an initial concept masterplan for the site and has led to the identification of a number of key layout and design opportunities. The overall proposal is provide a residential-led urban extension, whilst creating a development that maintains a natural transition between town and countryside.

The submission site lies within the Metropolitan Green Belt and within an Area of Local Landscape Importance however is otherwise free from planning constraints in all other respects. As set out within this document, it is considered that there are exceptional circumstances to allow Green Belt release, and that there is potential to develop the site in a way that will deliver a more sensitive transition between the urban edge and open countryside. These designations are therefore not considered a constraint to development.

The document concludes that the Site is located within a suitable area to allocate land for housing to help meet the growing need for homes in Medway and should be included within the emerging Local Plan.

Site SNF3 (Land at Brompton Farm) is being promoted with awareness of SNF1 coming forward through the Local Plan process. The Illustrative Masterplan can come forward whilst allowing the neighbouring site SNF 1 to also be delivered. The accompanying Transport Technical Note shows how the access and highway improvements through the preferred approach utilising a staggered signalised crossing could allow appropriate access to both sites SNF3 and SNF1.

N

and log pile habitats

Play

Community Allotments

Wild Flower Meadow

View Point

School

Play

Play

Neighbourhood Centre

Play

Play

Community Orchard

Green Finger

Green Finger

Vision

Given the site's location within the Metropolitan Green Belt, an overriding objective would be to deliver a development that offers a better transition between the current hard urban edge and the open countryside by:

- Forming a development with a strong sense of place where people will want to live;
- Creation of a range of open spaces within the site that will provide visual amenity, ecological enhancement and community benefits in addition to creating a unique, site specific character;
- Exploring the opportunity to provide a new shop, doctors surgery and any wider social infrastructure needed to create a local neighbourhood centre;
- Proposals that deliver land for a school in an accessible location;
- Provision of key facilities that will aid a high quality of life and minimise trips made by car;
- Development located in a deliverable and sustainable location, close to existing local facilities, employment and transport links;
- The delivery of housing that is set against an identified local and national need, including affordable housing, housing for older people and self build plots;
- Further strengthening of existing foot and cycle links that further promote sustainable transport choice; and
- Consideration of flexibility within the masterplan to cater for future requirements of the community.

Healthy placemaking

As part of the vision for the proposals, the scheme will aim to create spaces to encourage a mixed community at different life stages. From a single young person looking for their first home, through to the elderly couple hoping to downsize, the proposed environment will create a series of spaces that are sustainable to accommodate future needs.

The proposed scheme would seek to deliver opportunities for people to lead healthier lives. The site is located within walking and cycling distance of a wide variety of existing facilities and amenities, and these movement methods will be encouraged over the use of the car. The proximity of green spaces and the variety of residential options will all help to drive a strategy for healthy place-making.

Key aspects of the principles for healthy place-making of the scheme include:

- Enable exercise in normal patterns of daily life;
- Provide easy access to education, accessible facilities and available green spaces;
- Limit the causes and effects of vehicle emissions;
- Provide safe, sociable and productive public environments; and
- Good urban and transport design.

Some of these principles have already been addressed by the location of the site. However, as the scheme progresses, there are further urban design decisions that can be made to help ease the challenge of health conditions caused by a modern lifestyle.

Shopping - exercise

Due to its location close to local shops and facilities in the surrounding area, the proposed site offers the opportunity to function as a "*Walkable Neighbourhood*". Aldi and Asda supermarkets are located 1700m to the south in the centre of Strood, whilst other shops are available in the nearby on Frindsbury Road. Some of these offer a home shopping service helping to minimise shopping trips.

Education - exercise

The site is well located for nearby schools, accessed by a good network of pedestrian and cycle routes. The masterplan also includes a school site as part of the proposed scheme which will serve residents of the site and surrounding areas. Although some car drop-off and pick-up is inevitable, the good accessibility around the site by means other than the car will help limit its use. The proposals could encourage "*Safe-routes-to-school*" and "*Walking bus*" strategies.

Connecting with the landscape

A key aim of the proposals will be to enhancing people's quality of life by bringing them closer to nature through extensive new green infrastructure including woodland, trees and landscaped open spaces linked by paths and trails.

The provision of a wide variety of linked public open spaces for many different users, will encourage interaction and benefit the existing surrounding community as well as new residents.

Employment - exercise

The employment areas on the banks of the River Medway to the south east of the site are within walking and cycling distance of the site.

To help alleviate traffic and avoid the stress of commuting to work, homeworking would also be encouraged.

Leisure - exercise

The site could provide additional extensive areas of open space, providing a variety of formal and informal outdoor activities, including play areas, wildflower meadows and a community orchard. As many of the play spaces as possible will allow for disabled play. A Trim Trail could also be incorporated around the site with exercise stations spaced along its length providing opportunities for a variety of exercise options.

The site also benefits from easy and direct access to the countryside to the north via the public footpath network and Dillywood Lane.

Encouraging social interaction

The proposals for the site will provide a number of safe, sociable and productive public environments which will contribute to a lively social environment both on the site and within the wider community.

The open spaces will create places to meet allowing interaction with a wide variety of other users wishing to utilise the area for community use, events or celebrations. The open spaces will not only be used by occupants of the development but will provide a wider community focus. The connectivity plan above shows how many of the links across the site pass through the open spaces, creating many opportunities for interaction between various age groups and demographics.

The scheme should be designed to accord with the principles of '*Secured by Design*' to minimise the fear of crime.

The inclusion of private rear gardens and amenity space offers the benefits of outdoor activity and the means for healthy food production.

The site

The site lies between Brompton Farm Road to the south and Hasted Road (A289) to the north and Gravesend Road to the west. It currently consists of a number of former agricultural fields with hedged field boundaries. The site area is 44.6 hectares.

In terms of vehicular access, the site benefits from different opportunities via Gravesend Road, Brompton Farm Road and Stonebridge Lane. It is situated within close proximity to Strood (1.6 miles) and Higham mainline railway station (2.6 miles) and benefits from excellent access to the strategic road network via the A2.

The town centre of Strood is an easily achievable walking distance from the site and a number of bus stops are available immediately south of the site on Brompton Farm Road with services to Strood town centre and on Gravesend Road with services to Gravesend and Chatham. Strood Academy and Bligh Primary School provide educational opportunities within 2 miles of the site.

The nearest railway station to the site is in the centre of Strood with regular services to Rainham, Faversham, Luton, St Pancras International and Tonbridge amongst others.

View from Stodes Close looking west (Google)

View from Stodes Close looking north west (Google)

View of site boundary along Gravesend Road (Google)

Aerial view of the site looking north (Google) ▶

N
A289 - Hasted Road
Dillywood Lane
Public Footpath
Brompton Farm Road
Public Footpath
Gravesend Road
Broomhill Park
Broomhill Orchard
Rede Court Road
Abbey Court School

Considerations

An initial assessment of the site's opportunities and considerations has been undertaken, this process has helped shape the emerging masterplan to ensure the proposals respond to the site, its local context and give the development its own unique sense of place.

The physical considerations associated with the site and its context will inform and shape the development of the masterplan. Some of the key considerations include the following:

- Proximity to A289 Hasted Road to the north
- Location within Metropolitan Green Belt
- Existing trees and hedgerows
- Public rights of way across the site
- Relationship to existing properties on Brompton Farm Road and Gravesend Road
- Traffic noise from A289 Hasted Road
- Sensitivity of character along Dillywood Lane
- The topography of the site

Site considerations plan ▶

A289 Hasted Road
Dillywood Lane
N
2m
4m
12m
5m
20m
Fall of the land
Brompton Farm Road
A226 Gravesend Road
AM
0
100m

Opportunities

Having studied the site and its surroundings we have identified a number of opportunities that the site presents which make it an attractive and viable location for a new residential neighbourhood:

- Potential new vehicular access into the site from Gravesend Road and a secondary access from Strodes Close;
- Retention of the existing public rights of way network across the site and the creation of further pedestrian and cycle links within the site to increase permeability and access to the countryside north of the A289;
- The creation of a self-contained neighbourhood with its own identity and a strong sense of place;
- The provision of a good quality public realm with extensive areas of open space including woodlands, wildflower meadows, a community orchard and green fingers;
- The provision of a neighbourhood centre with small retail units and a medical hub to serve the new community;
- Potential provision of a school to serve the new neighbourhood and surrounding areas;
- Ecological benefits through the provision of woodland and pond habitats and green corridors through the development; and
- Opportunities for play and exercise including areas of linked open space with a variety for play opportunities and a fitness trail with exercise stations.

Site opportunities plan ▶

A289 Hasted Road
N
Dillywood Lane
Woodland Buffer
Woodland Walk
SuDS
Meadow
SuDS
Meadow
Views
Playing Fields
Meadow
School
Green Fingers Trim Trail
Neighbourhood Centre
Green Fingers Trim Trail
ard
Brompton Farm Road
Woodland
A226 Gravesend Road
0
100m

Concept development

1. Green infrastructure

- New woodland and green fingers;
- Community orchard; and
- Buffer planting to A289.

2. Blue infrastructure

- Sustainable drainage features
- Swales; and
- Wildlife ponds.

3. Public Open Space

- Wildflower meadows;
- Community greens;
- Woodland walks;
- Green routes;
- Community allotments; and
- Children's play areas.

4. Structural planting

- Tree planting to streets and open spaces; and
- Tree and shrub planting to development areas.

5. Movement network

- Pedestrian and cycle links along green fingers and through open spaces;
- Trim trail with exercise stations; and
- Mown paths through meadows.

6. Development

- Development overlooking green spaces to provide natural surveillance;
- Residential areas sub-divided by green fingers and tree lined streets;
- New school site; and
- New neighbourhood centre with medical hub.

Woodland Buffer

Ecological enhancements including bird & bat boxes and log pile habitats

DILLWOOD LANE

N

Play

Community Allotments

Wild Flower Meadow

View Point

School

Play

Green Finger

Play

Neighbourhood Centre

Play

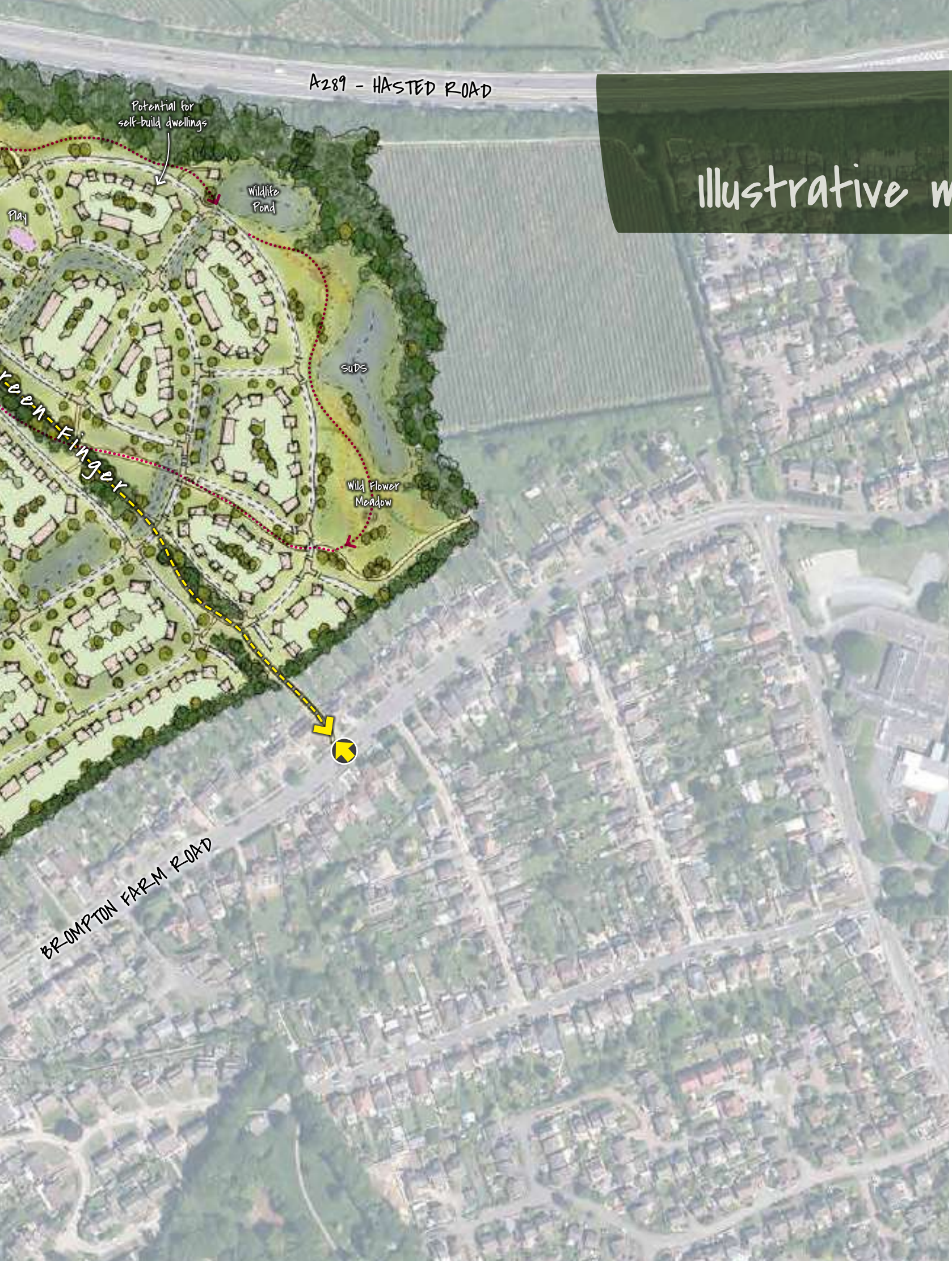
Green Finger

Play

Community Orchard

0 20m 40m 60m 80m

Illustrative masterplan



KEY

- Vehicular and pedestrian access
- Pedestrian access only
- Existing Public Right of Way
- Trim Trail
- Residential development parcels
- Footpath/cycle links
- Play areas
- Wildflower meadows
- Mown paths
- Viewing area
- Community orchard
- Community allotments
- SuDS features
- Neighbourhood centre
- School site
- School playing fields

Illustrative landscape proposals

The vision is to create a new residential neighbourhood that:

- has a strong sense of place and community;
- is well integrated into the local landscape;
- embeds robust, ecologically rich, green and blue infrastructure;
- delivers exercise, recreation and food production facilities as community assets; and
- delivers resilience against climate change.

Green Infrastructure Framework (right) demonstrates how the site could deliver a strong framework of new publicly accessible green infrastructure (GI) and a wide range of community assets.

New walking and cycling routes across the site would enhance connectivity. The site would be well connected to both the existing urban area and the surrounding rural landscape via Dillywood Lane.

A wide belt of well-treed GI along northern parts of the site would conserve the rural setting of Dillywood Lane and provide a soft rural interface. It would also incorporate wildflower meadow (Ref: 1), new allotments (Ref: 2), a community orchard (Ref: 3) and a platform for viewing the rural landscape (Ref: 4). This local food production would help bring the community together, promote active lifestyles and help address food security.

Space would be provided for provision of well-treed, characterful streets.

The site would deliver in excess of 17ha of publicly accessible GI for existing and future residents, thereby addressing an existing deficiency for open space in Strood North ward and significantly exceeding Natural England's target for natural green space provision of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home.

A new woodland would be established on the northern and southern parts of the site for landscape integration, enhancing local biodiversity and the rural setting for the A289 and conserving the landscape setting and separate identity of Higham.

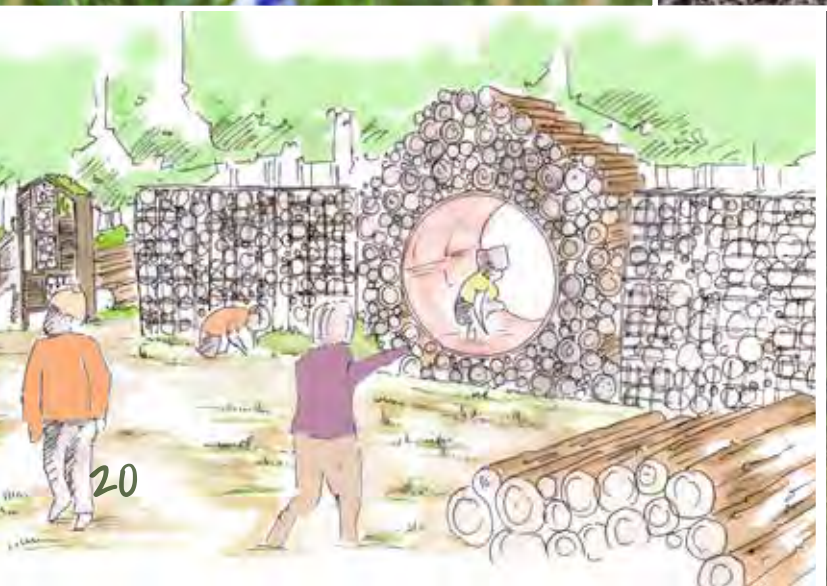
A new wildlife pond (Ref: 6) would be provided with along sustainable drainage basins (Ref: 7) in the well-treed eastern GI corridor.

This ecologically rich and multi-functional GI would provide for climate change mitigation, creation of new habitats, wildlife movement, formal recreation, routes for walkers/cyclists, trim trails, children's play and food growing to encourage active and healthy lifestyles. They would incorporate existing landscape assets such as trees, hedgerows and public footpaths.

Intermittent green spaces and 'green fingers' would permeate through the neighbourhood and would provide the vegetation framework for housing clusters and create a visual mosaic of buildings and trees for landscape and visual integration.

The intermittent green spaces would incorporate children's play areas and would serve as spaces for building community cohesion.

Wildlife ponds, wildflower meadows, play areas and woodland walks



Landscape & visual context

Landscape context

The site lies within the open countryside on the northern edge of the built up area. It forms part of the Metropolitan Green Belt *(Plate 1: Local Green Belt)* and the Dillywood Lane Area of Local Landscape Importance, which is "*a gently undulating, visually diverse area of orchards and mixed farmland*". The local landscape also includes tree belts and scattered woods.

Strood extends up from the River Medway onto a broad hillspur that includes the well-treed Broom Hill (85m AOD) as a local high point. The site occupies the mid and lower north-facing slopes of Broom Hill. A secondary hillspur passes through the north-western part of the site to create a U-shaped landform that predominantly descends north-eastwards *(Plate 2: Local Landform, overleaf)*. On the far side of this secondary hillspur, the land descends to form a shallow valley before climbing up again to join low hills on the edge of Higham.

The site comprises arable fields, orchards and areas of polytunnels. Two public footpaths across the site. The site abuts existing housing to the southwest (along Brompton Farm Road), southeast (along Gravesend Road) and north-west (Dillywood Lane). It is also enclosed by Gravesend Road to the southwest, by Dillywood Lane to the north-west and by the well-treed corridor of the A289 to the north. Dillywood Lane has a rural character and provides a route to the countryside north of the A289.

Visual context

The built up edges of Strood, existing housing along Dillywood Lane and countryside to the north and west form part of the visual context for the site. The lower parts of the site, when viewed from the rural landscape north of the A289, are typically enclosed or heavily filtered by the A289 vegetation belts and by trees along Dillywood Lane. The upper parts of the site, where visible, are typically seen against a backdrop of housing at Brompton Farm Road, Strodes Close and Gravesend Road. This off-site housing lies at a higher level, is visually prominent and is visually harsh in places.

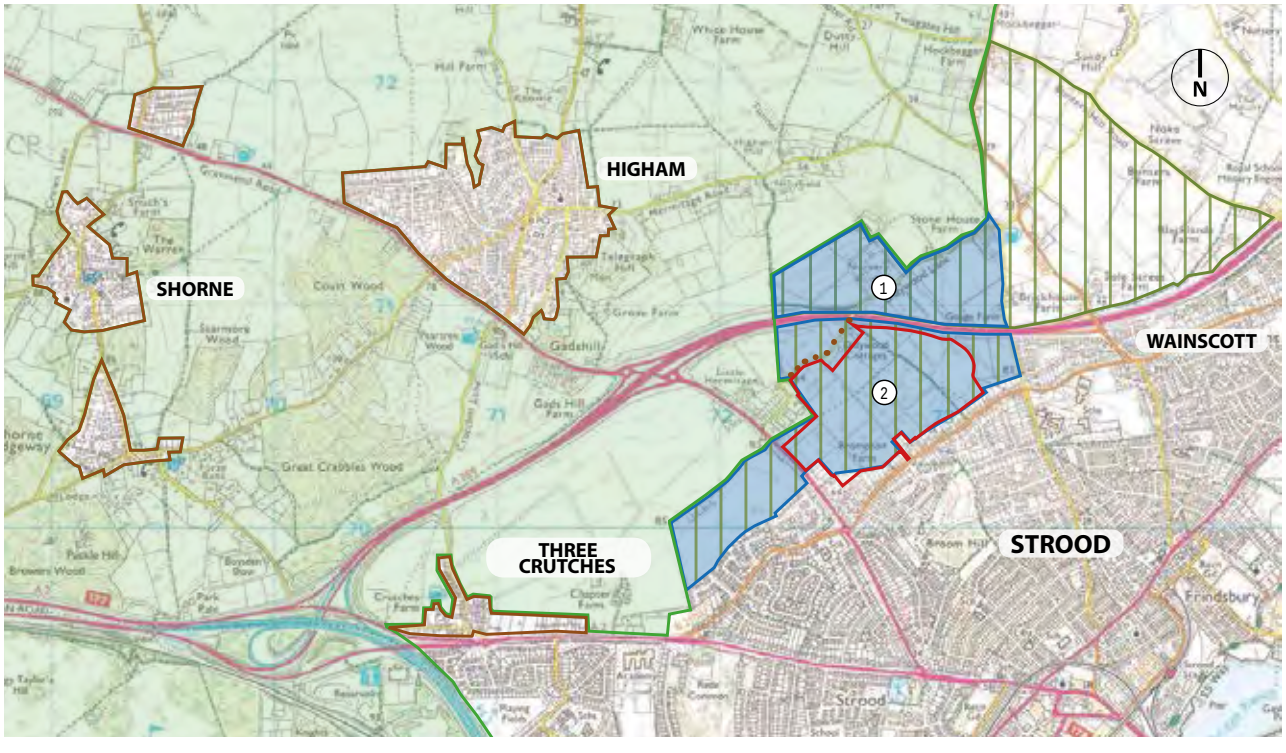


Plate 1: Local Green Belt (Scarp)

Green routes for pedestrians and cyclists, a fitness trail and easy access to existing Public Rights of Way

Effects on Green Belt purposes

A detailed analysis has been undertaken of the effects of the development on the purposes of the Green Belt. This Green Belt Review study concluded that the Development would result in an overall moderate level of harm to the Green Belt based on its current contribution to Green Belt purposes and the minimal effects on the adjacent Green Belt land north of Dillywood Lane and the A289.

The Development would relate well, both physically and visually, to the existing built up area. The new built form would abut existing housing along its south-eastern and south-western boundaries. The Dillywood Lane housing area, the spur of elevated land on the north-western side of the site and the proposed belt of GI (with retained and proposed vegetation) would provide a strong sense of separation from the wider countryside to the north and north-west.

The Development would not result in sprawl in the sense of spreading out in 'an untidy or irregular way' due to the containment provided by the A289 to the north, by Gravesend Road and associated housing to the west and by existing housing along Dillywood Lane to the north-west. The existing inner Green Belt boundary is defined by a line of visually harsh line of housing that is unrelated to any physical landscape feature. The site would deliver a new relatively distinct and robust Green Belt boundary in the form of the well-treed A289 road corridor.

Whilst the Development would result in some harm to the Green Belt purposes of preventing sprawl of the built-up area and encroachment upon the countryside, this harm would be mitigated by this landscape-led masterplan and its associated compensatory landscape, recreational and ecological improvements to the Green Belt.

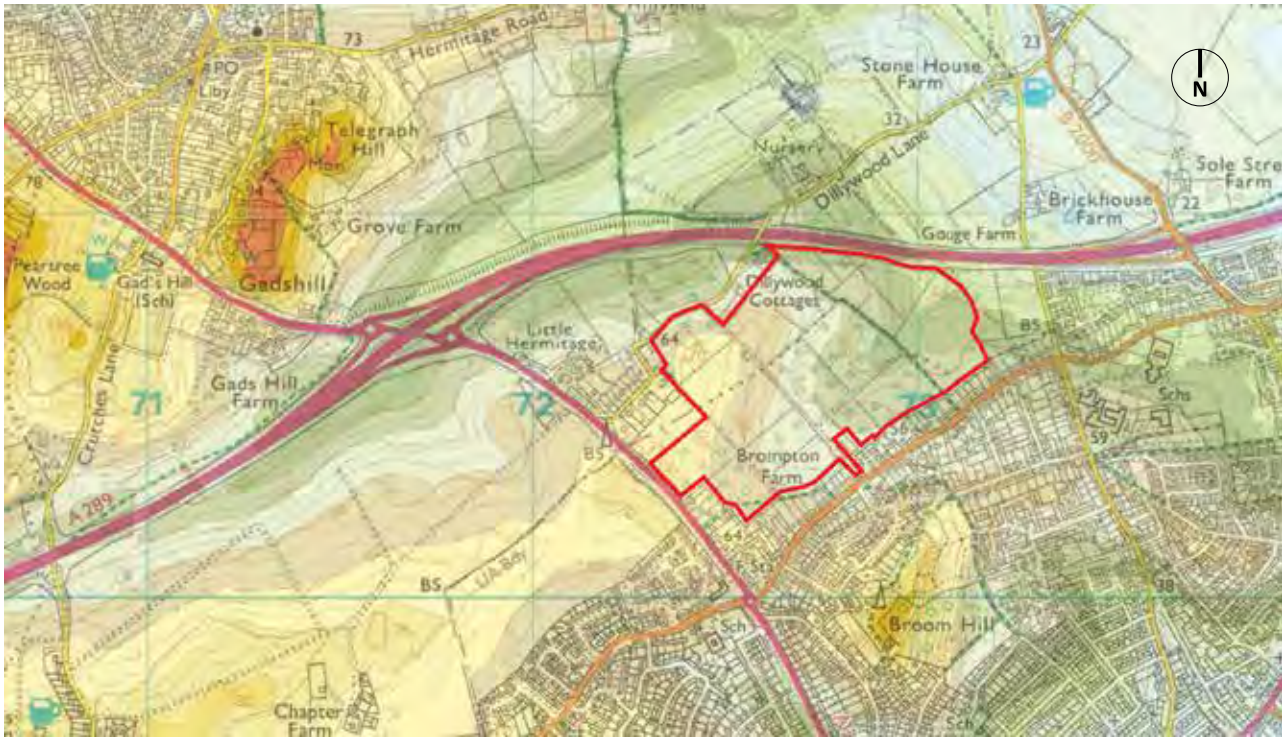


Plate 2: Local landform (Scarp)

Planning appraisal

Green Belt

As set out at paragraph 138 of the NPPF, Green Belt serves five purposes. Therefore we address the submission site in the context of each of these objectives below.

a) To check the unrestricted sprawl of large built-up areas

Urban sprawl can be defined as the advancement of sporadic and unplanned development beyond the clear physical boundary of a developed settlement.

Whilst this is a legitimate planning matter, there is no basis to assume that a well-planned strategy for Green Belt boundary review here would weaken or lead to any future risk of unplanned encroachment into the countryside. To the contrary, the submission site is located adjacent to the existing settlement boundary, so development would not result in sporadic or isolated housing. Instead, it would create a logical and well planned extension to the existing built development and would follow a similar pattern of development that has taken place elsewhere within the authority area. For example, Liberty Park to the north east.

Furthermore, this area of Strood is semi-rural in nature and does not represent a 'large built up area' that needs to be contained in the same was as other urban and London Boroughs that are far more urban in character. Release of the site would also represent a consistent approach to that adopted for sites such as Liberty Park a short distance away. In addition, the latest version of the Gravesham emerging Local Plan has a potential for a new settlement on the boundary of the Borough immediately to the north of the site. This is also a Green Belt location and demonstrates that Gravesham also think that this is a logical and sustainable location for development.

b) To prevent neighbouring towns merging into one another

The submission site is located to the north of Strood and west of Wainscott. The closest settlement beyond this is Higham to the north west (1.6km) or Cliffe Woods to the north (2km).

If the Green Belt boundary was to be amended to allow development of the submission site there would remain at least 1.25km separation between the closest settlements. Furthermore, both are physically divided by the A289 Bypass.

For this reason, there is no basis to assume that there would be any demonstrable erosion of the space between settlements, nor would the development of the site increase the risk of any two settlements merging.

c) To assist in safeguarding the countryside from encroachment

Encroachment can be defined as the presence of development within the Green Belt not connected or adjacent to a built up area. As the site borders the currently defined settlement confines, development on this site would form a natural and logical extension rather than represent encroachment into the countryside. More importantly, it would protect genuine areas of open land from risk of development.

Therefore this purpose is not applicable to the site.

d) To preserve the setting and special character of historic towns

Medway as a whole has historically expanded in erratic patterns. However, there is no significant history or special character in respect of this particular area. Furthermore, it does not lie within a Conservation Area.

e) To assist in urban regeneration, by encouraging the recycling of derelict land and other urban land

Given the constrained nature of the Borough of Medway and lack of brownfield opportunities land further land is needed to be designated which is either greenfield or green belt. Therefore this purpose is superseded by the requirement as the brownfield opportunities and regeneration are already being maximised.

Taking all of the above into consideration, the site currently plays a limited role in fulfilling the core functions of the Green Belt.

Further to the above, we are of the view that were the site not in the green belt it would be one of the most logical, sustainable and deliverable sites available to the Council to allocate. Since the Green Belt designation the infrastructure of the bypass has been constructed to the north now giving a much more logical defensible boundary. Because Medway has only a limited amount of Green Belt as a proportion the boundaries never get reviewed and therefore sites such as this which are logical for allocation in all other senses get overlooked and sites which do not have such good sustainability credentials get allocated instead. Given the need for housing in Medway, and the benefits of the illustrative proposals, we consider there to be exceptional circumstances to allow Green Belt release.

Sustainability

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles which development of this site would contribute towards.

The provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live, namely in a semi-rural location with excellent access to both town, countryside and essential day to day services.

The delivery of housing would also provide an economic benefit during and after build out. Construction jobs would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the council and local community to benefit from revenue link to Section 106 contributions.

From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.

Finally, we consider that in selecting sites for development the wider environmental quality of the authority area must be taken into account. From a visual perspective the illustrative masterplan presented with this submission is clear that a residential and open space led approach is advocated in order to provide an appropriate form of development and a transition between town and countryside. Likewise, opportunity exists to build upon existing ecological potential and to enhance the habitat for protected and non-protected species alike.

Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access to the site and strategic highway network

In terms of vehicular access, the illustrative masterplan indicates that the submission site benefits from different opportunities for access via both Gravesend Road and Brompton Farm Road. Sufficient land exists to ensure that a safe and efficient access meeting current highway design standards could be provided. It is situated within close proximity to Strood (1.6 miles) and Higham mainline railway station (2.6 miles) and benefits from excellent access to the strategic road network via the A2.

Within the Council's previous SLAA in 2018 the findings made little of the ability to provide a new connection to the A289 and direct links to the A2/M2 on the basis that no such upgrade is planned or funded at present. Given that the submission site is one of the few sites where such linkages are achievable, we consider that the site should score far more positively within the scope of the assessment in this regard.

Landscape impact

The site is situated outside of the built up area, within an area of local landscape importance. However there is potential for developing the site in a sensitive way that delivers a more sensitive transition between the hard, dense urban edge and the open countryside. Not only this, this transition has greater scope to be controlled by virtue of the firm boundary of the A289, which also has significant impact on the wider landscape.

The site's location in an area of local landscape importance is therefore not a constraint which would prevent development.

Trees

A number of trees and hedgerows lie within and around the edge of the submission site. None of these are subject to a Tree Preservation Order. Any future application would be accompanied by necessary Tree Surveys. Existing trees and hedgerows would be retained where possible. No trees or hedgerows are considered to present a constraint to development,

Public Rights of Way

Two Public Rights of Way cross the site. These can be incorporated into the site without constraining development potential, as demonstrated by the accompanying illustrative masterplan.

Flood risk

The site lies within Flood Zone 1 and is therefore not at risk of flooding.

Contamination

The site is not considered to have a likely presence for contamination and this would therefore not constrain development.

Archaeology and heritage

There are no heritage assets with or adjacent to the application site. The site is not known to have a presence for archaeology however mitigation for any potential archaeological finds can be secured by condition requiring a full archaeological investigation in accordance with a pre-agreed specification.

Noise and air quality

The site is not within an Air Quality Management Area and so this is not considered to present a constraint. Any noise or air quality related constraints can be addressed as part of a high quality masterplanning process and do not represent absolute constraints to development.

Agricultural land value

As part of the Council's previous assessment it was considered the site is situated on the best and most versatile agricultural land. The findings of this is however questioned, particularly as part of the land has historically been used for non-agricultural uses including car parking, and other commercial purposes. In this respect there are numerous concrete pads from former buildings on the site, and in places rubble to a depth of several feet. This means that the land cannot be used for agricultural purposes as machinery cannot be deployed due to the amount of debris below.

The agricultural land value of the site is therefore not considered a matter which would represent an absolute constraint to development.

Deliverability

In order for sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making. We can confirm that there would be no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period.

Suitability

For reasons set out in this statement the site is considered suitable for development. In summary, the site borders the currently defined town centre confines and would form a natural, logical and sustainable extension.

Residential development on this site would make a useful contribution to the housing land supply for both market and local needs affordable housing, which is tantamount to the exceptional circumstances needed to justify the altering of Green Belt boundaries.

Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

Achievability

The site is in two separate ownerships. However there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

Key benefits

- A new sustainable neighbourhood
- Up to 17 hectares of accessible Open Space
- Extensive pedestrian and cycle routes
- Retention of existing Public Right of Way network
- High quality public realm
- Children's play areas
- Fitness Trail
- Community orchards and allotments
- Small retail units
- A medical hub
- A new school
- New meadow, wooded and wet habitat areas
- New homes including affordable provision and self build options

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